THIRD STREET LIGHT RAIL PROJECT

VOLUME 2

Response to Comments

FINAL ENVIRONMENTAL IMPACT STATEMENT

FINAL ENVIRONMENTAL IMPACT REPORT

Federal Transit Administration - U.S. DOT
City and County of San Francisco
Planning Department

November 1998

State Clearinghouse #96102097
SF Case File No. 96.281E

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City and County of San Francisco
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November 1998

State Clearinghouse #96102097
SF Case File No. 96.281E

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ICF Kaiser Engineers, Inc.

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A. Agencies

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

#1

May 7, 1998

RECEIVED
MAY 11 [illegible]
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Mr. Bob Hom
Director, Office of Program Development
United States Department of Transportation
Federal Transit Administration, Region IX
201 Mission Street, Suite 2210
San Francisco, California 94105

Dear Mr. Hom:

The United States Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement/Report (DEIS/R) for the **Third Street Light Rail Project, City and County of San Francisco, California**. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's Regulations for Implementing NEPA (40 CFR 1500-1508), and Section 309 of the Clean Air Act. On January 13, 1997 EPA provided written comments to the San Francisco Municipal Railway (MUNI), with a copy to you, on the Notice of Intent distributed for the scoping of the DEIS/R.

The United States Federal Transit Administration (FTA), in cooperation with the MUNI, proposes to construct a new light rail transit (LRT) line into the southeastern quadrant of the City and County of San Francisco. The DEIS/R analyzes the potential environmental impacts of three alternatives: the No Project alternative, the No Build/Transportation System Management (TSM) alternative, and the LRT alternative. The No Project alternative would perpetuate existing conditions in the Third Street corridor; the No Build/TSM alternative would meet increased transit demand via expanded bus service; and the Light Rail alternative would extend MUNI light rail services in two phases. The Initial Operating Segment (IOS) would extend light rail from King Street to the Bayshore Caltrain Station via Third, Fourth, and Bayshore Boulevard. A later Central Subway phase would extend service northward to Chinatown via Third/Fourth, Geary and Stockton Streets.

Based on our review of the DEIS/R, we have assigned a rating of **LO, Lack of Objections**. Our initial comment is that the proposed project is of great merit, in that it would serve to reduce vehicle miles travelled (VMT) and air pollution emissions in an area slated for major redevelopment growth in the next 20 years. Although we have a lack of objections with the proposed action, we would like to offer the following comments in regards to following issues discussed within the DEIS/R: Environmental Justice and Intermodal Transportation. 1-1

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The EPA commends you for your efforts concerning the environmental justice analysis presented within Section 5.3.2 ENVIRONMENTAL JUSTICE CONSIDERATIONS. In particular, we are pleased with your attempts to reach a wide variety of ethnic groups via your public outreach program, and furthermore, we believe that this level of community participation satisfies one of the intents of Executive Order 12898, that is, to involve affected minority and low income communities in the project planning process. In keeping with this spirit, we suggest that the City and County of San Francisco further involves the affected neighbourhoods by offering employment opportunities and/or training for job opportunities that are made available during the construction and operation phases. 1-2

Section 3.2.7 BICYCLES, indicates that the potential for conflicts between motorists and bicyclists could increase due to the proposed reduction in the number of existing lanes, thereby creating more competition for the remaining limited space between bicycles, autos, and trucks. As partial mitigation for this impact, the DEIS/R recommends that the MUNI consider establishing a policy providing for the accommodation of bicycles on the Third Street light rail vehicles. The EPA concurs with the establishment of such a policy and in a way that facilitates this intermodal transportation option (i.e., provide bike storage on all trains rather than limiting potential rider ship by stipulating the number of allowed bicyclists per train, hours of use, etc.). 1-3

We appreciate the opportunity to comment on the DEIS/R. Please send one copy of the Final EIS/R to my attention (mailcode: CMD2) when it is filed with the EPA's Washington, D.C. office. In the meantime, should you have any questions, please call me at (415) 744-1584 or Mark Bartholomew of my staff at (415) 744-1522.

Sincerely,

David Farrel, Chief
Federal Activities Office

cc: Hillary Gitelman, San Francisco Planning Department, San Francisco

3rdlrt.let #003066

THIRD STREET LIGHT RAIL PROJECT
RESPONSES TO COMMENTS

A. AGENCIES

Comment Letter 1

David Farrel, Chief
Federal Activities Office
United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Response 1-1

Comment noted. Based on the review of the Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR), the US Environmental Protection (EPA) has assigned a rating of "LO", Lack of Objections with the proposed action.

Response 1-2

Comment noted. The City and County of San Francisco (City) has continued to involve the community in the project decision process. For example, subsequent to the release of the DEIS/DEIR for public review, a series of workshops were held in affected neighborhoods and presentations on the project decision were made to numerous community organizations. Since environmental scoping in Fall 1996, MUNI staff has made presentations at 121 public meetings.

Response 1-3

Comment noted. The Municipal Railway's (MUNI) Service Planning Department has agreed to study the possibility of allowing bicycles on light rail vehicles.

U.S. Department of Transportation

United States Coast Guard

Commander (Pow-2)
Eleventh Coast Guard District

Coast Guard Island
Alameda, CA 94501-5100
Staff Symbol: (Pow-2)
Phone: (510) 437-3514
FAX: (510) 437-5836

#2

16593
Channel Street (0.0)
Channel Street (0.2)
Ser: 346-98
May 19, 1998

Mr. Brian J. Kalahar
Environmental Planner
San Francisco Planning Department
1600 Mission St. 5th Floor
San Francisco, CA 94103-2414

Dear Mr. Kalahar:

Thank you for providing us with a copy of the Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) dated March 23, 1998 for the 3rd Street Light Rail Project in the City and County of San Francisco. We appreciate the document's thorough treatment of the new Giants stadium near the 3rd and 4th Street bridges over Mission Creek. The detail provided is sufficient for us to limit our comments to those sections of the document which may directly impact marine traffic on Mission Creek.

Please review our letter to the San Francisco Giants regarding our concerns about drawbridge operation (encl. 1). With good communications between bridge operators and the ball park there should be no need to change the regulations governing operation of the two Mission Creek drawbridges.

Your document acknowledges on pages S-21 and 4-16 that there could be 40,000 baseball fans, and advises on page 3-46 that traffic may be problematic before and after Giants games. Section 2.1.3 of your document also advises of potential increased conflicts between pedestrians, vehicles and light rail before and after baseball games. I am hopeful that your project will actually alleviate congestion across the Mission Creek bridges at such times. I believe the the following measures under consideration for your project could minimize transportation conflicts at the Third and Fourth Street Bridges: 2-1

a. Construction of a couplet as addressed on pages S-34 and 2-30 of the DEIS/DEIR, which would incorporate light rail on both bridges. Such a configuration could enable light rail to travel in and out of the ball park area more quickly.

b. Standard signalization, signing and pavement markings addressed on page 3-47 to insure that motorists are aware of mixed flow operations, and to enhance traffic flow in the vicinity of the 3rd and 4th Street Bridges. 2-2

c. Restricting parking in the vicinity of 3rd and 4th Streets near Mission Creek, as well as between Brannan and Townsend Streets, as discussed on pages 3-65 and 3-67, could permit wider sidewalks which would facilitate pedestrian ingress and egress from the ball park.

My remaining comments are primarily editorial in nature:

a. Please also identify the 3rd Street Bridge over Mission Creek on page 4-48 as historical. 2-3

b. Page 2-74 please remove the first listing for USCG approvals or permits "Navigable Water Crossing (Bridge Permits)". The Coast Guard plans to authorize any needed work on the bridges under 33 CFR 115.40, repairs-in-kind, since navigation clearances would not change, and the bridge design and appearance would remain essentially unaltered. 2-4

c. Please note on Page 2-74 that it is the U.S. Army Corps of Engineers, and not the U.S. Coast Guard who would grant a permit for the underwater cable. 2-5

d. Figure 3-4 shows the Bay Trail as a new crossing over Mission Creek. I believe you intended to place this crossing along either the 3rd or 4th Street Bridges, not as a new bridge. A new bridge would require a Coast Guard bridge permit. 2-6

e. I note in Chapter 9 that the Mission Creek Homeowners Association (MCHA) which you reference as "A small houseboat community…located along Mission Creek Channel" on page 4-24 has not been specifically listed as part of the Community Advisory Group (CAG) in Section 9-3. MCHA members almost always need drawbridge openings to gain access to, and egress from berthing via the Channel Street waterway. They should be included in any discussions or development that may potentially affect their access. 2-7

In closing, I also note your acknowledgment that Pier 80 nearer the Islais Creek (H. L. Nishkian) Bridge may, at some point, be accessed by a new rail bridge. I have no additional comments to offer regarding either the new rail bridge or the existing H.L. Nishkian Bridge.

Should you have any additional questions, please do not hesitate to contact me or Mr. Jerry Olmes, my project officer at (510) 437-3514.

Sincerely,

W. R. FILL
Chief, Bridge Section
U. S. Coast Guard
By direction of the District Commander

Encl: (1) Commander (pow-2) letter dated May 18, 1998

Copy: MCHA w/encl
SF Giants Mr. Felder w/encl

U.S. Department of Transportation

United States Coast Guard

Commander (Pow-2)
Eleventh Coast Guard District

Bldg. 50-6
Coast Guard Island
Alameda, CA 94501-5100
Phone: (510)437-3514
FAX: (510)437-5836

16593
Ser: Pow 078-98
Channel St. (0.0)
May 18, 1998

Attachment

San Francisco Giants
ATTN: Mr. Alfonso Felder
3-Com Park
San Francisco, CA 94124

Dear Mr. Felder:

Thank you for your February 2, 1998 response to my December 5, 1997 letter regarding operation of the 3rd and 4th Street Bridges over the China Basin Channel. On review of your letter, as well as review of the Ballpark EIR, I anticipate another meeting with you, the City and MCHA could resolve boater concerns–without changing the existing regulation, and without alternative moorings.

You advise that close coordination between the Giants and bridge operators should eliminate delays in most instances even during event periods. I believe prompt and reliable communication between the bridges and the ballpark would enable the bridges to accommodate all requests for openings within one hour–even before and after games. Good communication should allow the bridges an approximate 45 minute "blackout" period during the standard one hour advance notice immediately before and after the games during which they would not open (unless for emergency vessels. To reduce the demand on the bridges, and decrease impacts to fans, the MCHA has already offered to depart their Mission Creek moorings in groups at pre-arranged times (encl. 1).

These joint efforts by all parties to minimize impacts should allow the majority of persons to enter and exit the area following games - the Ballpark EIR (page IV.216) stated that 72% to 82% would leave after the game within one hour. Openings up to one hour before a scheduled start would similarly impact few arriving fans.

Regarding moorings, I need to qualify our December 5 letter - we would not require them unless waiting for an opening compromised vessel safety. One potential danger is possible collisions between returning MCHA vessels waiting for the bridges–with shuttle ferries proposed with the new Ballpark (encl. 2). Our meeting could explore whether sufficient area is available for waiting MCHA vessels without interference from shuttle ferries, especially during the "blackout" period. The meeting could also examine the status of the existing Pier 46B (presently used by T N' Tug N' Tow) and your ferry landing. Possibly, vessels waiting for the bridge could temporarily tie off to those moorings.

One final item in our December 5, 1997 letter, and the Ballpark EIR (page I.52) relates to concerts or other events at the facility. The SF Giants, as facility owners, would be ultimately responsible for setting up communications between the bridge and stadium, so that both overland and marine traffic can be safely accommodated at the bridge. We would be happy to discuss this also at our next meeting.

ENCLOSURE(1)

16593
May 18, 1998

Please let us know when you could arrange a meeting similar to the one Jerry Olmes of my staff attended on May 27, 1997 at the Mayor's office. That meeting was also attended by David Prowler, Dean Macris, Betty Boatright, Corinne Woods and Arjan Bok. Please do not hesitate to contact us at (510) 437-3514 if we might be able to answer any questions.

Sincerely,

W.R. TILL
Chief, Bridge Section
U.S. Coast Guard
By direction of the District Commander

Encl: (1) MCHA letter of February 17, 1998
(2) Army Corps of Engineers Application for Letter of Permission File 22980S of August 22, 1997

Copy: Mr. David Prowler, Special Assistant to the SF City Mayor's Office w/encls
Mancini-Mills ATTN Mr. Dean Macris w/encls
Ms. Betty Boatright, Mission Creek Harbor Association w/encls
Ms. Corinne Woods, Mission Creek Harbor Association w/encls
Mr. Arjan Bok, Mission Creek Harbor Association w/encls

Comment Letter 2

W.R. Till, Chief
Bridge Section
US Coast Guard
US Department of Transportation
Coast Guard Island
Alameda, CA 94501-5100

Response 2-1

As noted on pages 3-45 and 3-46 of the DEIS/DEIR, future year 2015 traffic conditions near both Mission Creek bridges would be congested during normal weekday peak periods. Before and after major events at the new Giants ballpark, congested conditions would also be expected, especially under Option 2 (light rail on both bridges) due to the reduced number of northbound travel lanes along Third Street. The DEIS/DEIR did not assess pre- and post-event traffic conditions for the new Giants ballpark at China Basin nor did it evaluate future pre- and post-event traffic conditions assuming a condition without light rail. However, due to the person-carrying capacity of light rail vehicles, it is likely that provision of the Third Street Light Rail Project (Project) would alleviate traffic congestion across the Mission Creek bridges before and after major events, with Option 1 (light rail on the Fourth Street bridge only) providing more congestion relief than Option 2. On June 23, 1998, the Public Transportation Commission (PTC) selected the Fourth Street bridge for a bi-directional crossing of Mission Creek as part of the Locally Preferred Alternative.

Response 2-2

As noted in the "Staff Initiated Changes," the Public Transportation Commission selected the Fourth Street bridge for a bi-directional crossing of Mission Creek by the light rail line. As part of the light rail project, standard signalization, signing and pavement markings would be installed to insure that motorists are aware of mixed flow operations across the bridge. In addition, parking would be restricted in the vicinity of the Fourth Street bridge, as well as between Brannan and Townsend Streets, as discussed on pages 3-65 and 3-67 of the DEIS/DEIR.

Response 2-3

The DEIS/DEIR text on page 4-48, under Section 4.5.5, Segment 5 – 16th Street to King Street, is revised to add the historic Third Street bridge as noted.

> To the north, the Mission Creek lift bridges, including the historic **Third Street and** Fourth Street bridges, frame the China Basin building.

Responses 2-4 and 2-5

Table 2-14, Agency Approvals, on page 2-74 of the DEIS/DEIR is revised to delete the Bridge Permit for Navigable Water Crossing listed for the Coast Guard, and replace the US Coast Guard with the US Army Corps of Engineers as the agency responsible for permitting an underwater cable for Mission and Islais Creeks.

TABLE 2-14

AGENCY APPROVALS
(Revised July 24, 1998)

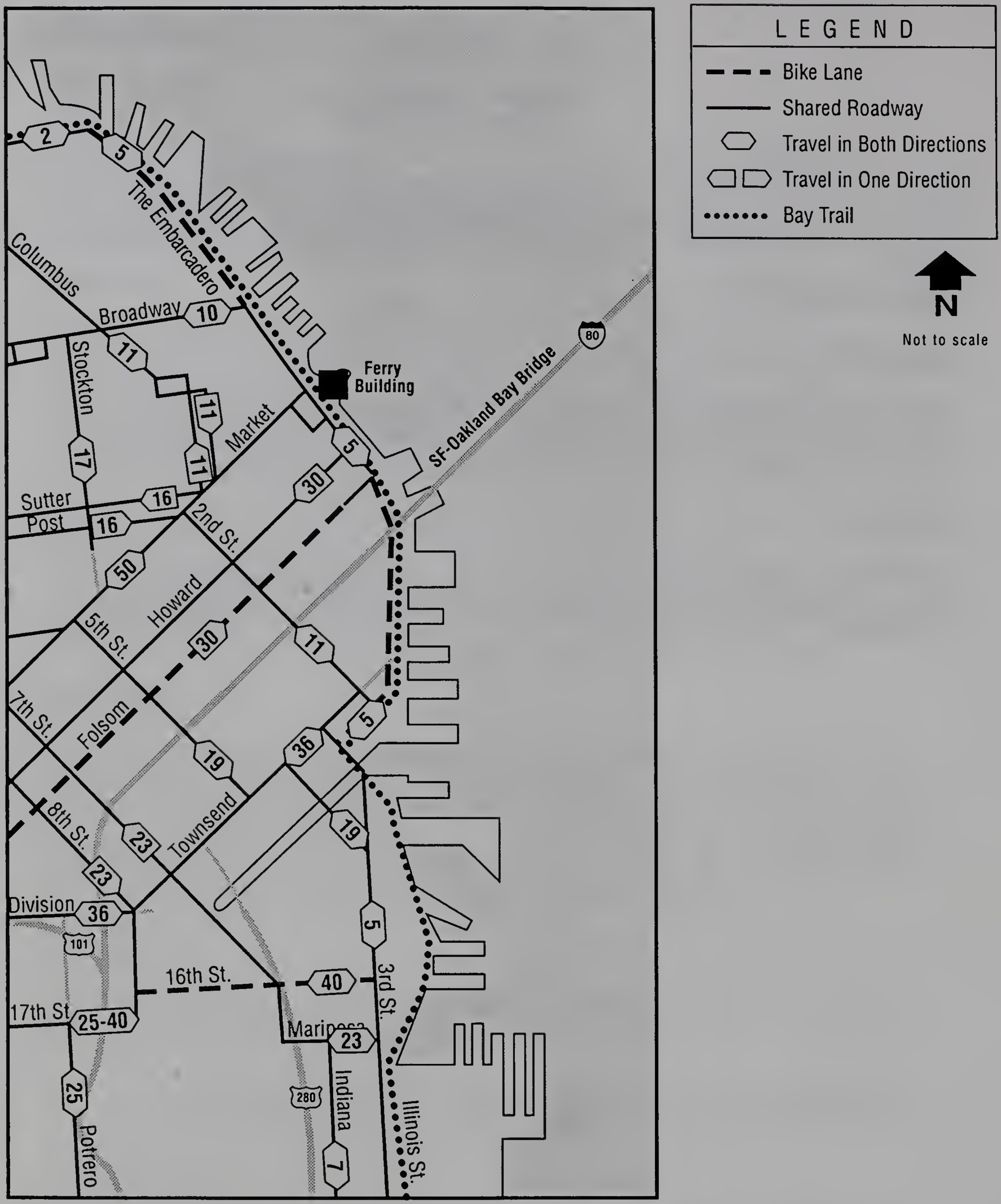
Agency	Approval or Permit
US Dept. of Transportation - US Coast Guard	~~Navigable Water Crossing (Bridge Permits)~~ Navigable Waterway Crossing Approval
~~US Coast Guard~~ **US Army Corps of Engineers** State Fish and Game Department US Fish and Wildlife Service	Nationwide permit for underwater cable (Mission and Islais Creeks)

Response 2-6

Figure 3-4 in the DEIS/DEIR incorrectly showed the Bay Trail crossing the Mission Creek Channel between the Third and Fourth Street bridges. Figure 3-4 is revised to indicate the Bay Trail crossing the Third Street bridge, as discussed on page 3-24 of the DEIS/DEIR.

Response 2-7

Comment noted. MUNI staff will maintain contact with representatives from the Mission Creek Homeowners Association as plans for design, construction and operation across Mission Creek move forward.



J96-082.100a 3rd St. (7/21/98)

FIGURE 3-4

BICYCLE ROUTES AND BAY TRAIL IN THE THIRD STREET CORRIDOR

Third Street Light Rail EIS/EIR

Source: ICF Kaiser Engineers, Inc.

(Revised 7/21/98)

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

#3

ER-98/196

MAY 22 1998

MAY 29 1998
S.F. PLANNING DEPT.

Mr. Leslie T. Rogers
Regional Administrator
Federal Transit Administration
201 Mission Street, Suite 2210
San Francisco, California 94105-1831

Dear Mr. Rogers:

This is in response to the request for the Department of the Interior's comments on the Draft Environmental Impact Statement (DEIS) for the construction of the Third Street Light Rail Project, San Francisco County, California.

We concur that there is no prudent and feasible alternative to the proposed project, if project objectives are to be met. However, we do not believe that all possible planning has been done to minimize harm to historic and archeological resources which may be affected by the proposed project. 3-1

In her letter of February 17, 1998, the State Historic Preservation Officer (SHPO) indicated that the Federal Transit Administration has not yet completed the identification of prehistoric and historic archeological properties in the project area, as required under Section 106 of the National Historic Preservation Act of 1966, as amended. The archeological testing program outlined in the Archeological Information Investigation should be completed before the identification process can be considered done. Moreover, a Memorandum of Agreement (MOA) should be prepared if the proposed project would impact any historic and/or archeological properties, in compliance with Section 106. A signed copy of the MOA, if one is found necessary, should be included in the Final EIS. 3-2

We reserve the right to provide further comments on the proposed project when the Final EIS is circulated for review and comment.

We appreciate the opportunity to provide these comments.

Sincerely,

Willie R. Taylor

Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

cc: Ms. Hillary E. Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, 5th Floor
San Francisco, California 94103-2414

Comment Letter 3

Willie R. Taylor, Director
Office of Environmental Policy and Compliance
US Department of the Interior
Office of the Secretary
Washington, DC 20240

Response 3-1

A detailed record search and field reconnaissance was completed for the project by qualified architectural historians and an archeologist. A Historic Architectural Survey Report, an Archaeological Resources Report, and a Historic Properties Survey Report were submitted to the State Office of Historic Preservation (SHPO) prior to the publication and review of the DEIS/DEIR. The Third Street Light Rail Project's "Finding of No Adverse Effect", which was submitted by MUNI and FTA to SHPO, did not identify potentially adverse effects to any property. SHPO's response is included in Volume I, Appendix F of the Final EIS/EIR.

Response 3-2

As described on pages 5-28 and 5-29 of the DEIS/DEIR, no potential impacts to Prehistoric or Historic Archaeological Resources have been identified for the Initial Operating Segment of the proposed light rail project. This phase of the proposed project is scheduled for construction in 1999 and would be financed with local funding (see Section 7.0, Financial Feasibility, of the DEIS/DEIR). The New Central Subway would require federal funding, which has not yet been identified. This phase of the proposed project is estimated for construction in about 2008, 10 years from now. Conducting an archaeological testing program would be initiated prior to further planning for the New Central Subway.

A copy of the Department of the Interior letter has been forwarded to the SHPO for review and advice regarding the suggested Memorandum of Agreement in order to fully comply with Section 106. The response is included in the Final EIS/EIR.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY
PETE WILSON, *Governor*

DEPARTMENT OF TRANSPORTATION
BOX 23660
OAKLAND, CA 94623-0660
(510) 286-4444
TDD (510) 286-4454

May 14, 1998

SF-080-05.50
SCH#96102097
SF080070

#4

Mr. Brian Kalahar
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103-2414

Dear Mr. Kalahar:

Re: Third Street Light Rail Project (DEIR/DEIS)

Thank you for including the California State Department of Transportation (Caltrans) in the review process for the above-referenced project. We have completed our review and forward of the following comment:

1. Absent technical studies for departmental review in the areas of hazardous materials, archaeology, historic architecture, it is not possible to determine if there are impact associated with right-of-way transfers of Caltrans lands. 4-1

2. The document does not address the potential impact of the Third Street Light-Rail Project on Route 101 at third street off-ramp. It needs to analyze and evaluate the operation impact and mitigation measures on Route 101 in both directions. This project may require reconstruction of retaining walls and a new off-ramp on Route 101. These work items are not discussed in the DEIR?DEIS. 4-2

3. On page 2-74 (Agency Approvals): There is no mention of Caltrans as an agency for which a permit would be required (in order to encroach on Caltrans Right-of-Way.) If work on Route 101 is anticipated as part of this project, Caltrans should be listed. 4-3

We appreciate the opportunity to work with you on this project. Should you have any questions, please call Dai Chung of my staff at (510) 286-5737.

Sincerely,

HARRY Y. YAHATA
District Director

By: Dai Chung

for PHILLIP BADAL
District Branch Chief
IGR/CEQA

cc: CBelsky SCH

Comment Letter 4

Harry Y. Yahata, District Director
State of California Department of Transportation
Box 23660
Oakland, CA 94623-0660

Response 4-1

On page 5-26, Section 5.5.2, the DEIS/DEIR states that the only historic properties within the Area of Potential Effect (APE) for the Initial Operating Segment (IOS) are the Third and Fourth Street bridges and the Islais Creek Bridge. These properties are not associated with potential Caltrans right-of-way transfers to implement the IOS. Similarly, on page 5-28, the document indicates that no impacts to prehistoric or historic archaeological resources are anticipated by implementing the IOS because excavation would not be deeper than what was previously disturbed during street and utility construction. For hazardous materials, Section 4.10.4, Potential and Known Soil and Groundwater Contamination, indicates that hazardous materials are most likely to be found in areas of fill. As presented in Figure 4-12, no known hazardous materials are located in Caltrans right-of-way surrounding the Highway 101 overcrossing that may be associated with project-related land transfers.

The DEIS/DEIR summarizes the information contained in the Technical Reports and background files, focusing primarily on resources and impacts that are potentially significant. The Technical Reports are available for review at the San Francisco Planning Department, as noted in the DEIS/DEIR (for example, see footnote No. 122 on page 4-70 for reference to the availability of the Hazardous Materials Technical Report at the Planning Department). A Historic Property Survey Report, an Archeological Survey Report, and a Finding of No Adverse Effect were prepared by Dames & Moore and were provided to SHPO for review. Three Caltrans staff, Noreen Rodriguez, Mort Azini, and Bijan Sartipi, were members of the Technical Advisory Committee for the Project and have access to the background materials that were incorporated into the DEIS/DEIR.

Response 4-2

Implementing the IOS will require a reconfigured off-ramp to be constructed from northbound Highway 101 to northbound Third Street, as stated in the DEIS/DEIR on page 2-21. The reconfigured off-ramp will require construction of a new retaining wall, described on page 2-23. Subsequent analysis has been performed and documented in the *US 101 and Third Street Overcrossing Draft Project Study Report/Project Report* (April 1998), available at the San Francisco Planning Department. The analysis confirms the DEIS/DEIR findings that the northbound off-ramp can be realigned without affecting the capacity of the off-ramp during construction or after realignment is completed.

Additional information regarding the roadway modifications associated with the Highway 101 overcrossing is presented in the "Staff Initiated Changes" section of this report. No new impacts are identified that are not already discussed in the DEIS/DEIR.

Response 4-3

Caltrans is listed under agencies with approvals for Access Control Properties Review, and Freeway Agreement Modification in Table 2-14 on page 2-74. The table will be revised to add the permit to encroach on Caltrans right-of-way.

TABLE 2-14

AGENCY APPROVALS
(Revised July 24, 1998)

Agency	Approval or Permit
Caltrans	Access Control Properties Review, Freeway Agreement Modification**; Permit to Encroach on Caltrans Right-of-way.**

STATE OF CALIFORNIA

PETE WILSON, Governor

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

May 19, 1998

#5

Hillary E. Gitelman, Environmental Review Officer
Planning Department
City and County of San Francisco
1660 Mission Street
San Francisco, CA 94103-2414

RE: THIRD STREET LIGHT RAIL PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT (SCH 96102097)

Dear Ms. Gitelman:

Thank you for the opportunity to comment on the Draft EIS/EIR for the Third Street Light Rail Project. The Staff of the Commission's Rail Safety and Carrier's Division, Traffic Engineering Section has reviewed the Draft EIS/EIR and offers the following comments for your consideration.

Construction of new rail crossings and modification of existing crossings are subject to Commission authorization as described under Public Utilities Code, Section 1200, et al. Furthermore, the Commission has the exclusive power to determine and prescribe the manner, including the particular point of crossing, terms of installation, operation, maintenance, use, etc. of each railroad crossing. Therefore, the California Public Utilities Commission (CPUC) is correctly included under Section 2.7.2 **Required Permit and Approvals**, of the EIS/EIR. However, the citation as stated is somewhat misleading.

5-1

The "Permits required" are formal CPUC proceedings. This involves filing a formal Application, which must conform to the Commission's Rules of Practice and Procedure, requesting authorization to construct a crossing (or crossings). The Application is reviewed by Commission Staff for public safety, convenience, and necessity. If found to meet CPUC requirements, staff will recommend that the Commission issue a Decision authorizing construction of the crossing(s). This process takes several months, and, if a hearing is needed, may take more than a year. In view of the large number of at-grade crossings proposed in this project (estimated at over 50), it is anticipated that many Applications would be submitted for evaluation prior to authorization and construction.

The required authorization is not limited to at-grade crossings, as stated in Section 2.7.2. of the EIS/EIR. It applies at grade separated crossings, such as where the proposed Light Rail line crosses U.S. Highway 101. It also applies at rail/rail crossings, such as the five areas shown in Figure 3-3 as points of "potential freight/LRT conflict." The Commission may require grade separation of proposed at-grade crossings, such as the pedestrian-only crossing shown at the Caltrain/LRT transfer station at Bayshore. 5-2

Authorization for any deviation from the requirements of the Commission's General Orders (G.O.) must also be requested. Each request must be evaluated, which takes some time, before Commission action can be taken to grant the request - and more time if revisions are required. Examples include G.O. 26-D (22.5' vertical clearance above freight railroad tracks), 95 (overhead wire vertical clearance requirements), and 143-A (as cited in Section 3.2.4 of the EIS/EIR). Other General Orders which may be applicable include 33-B, 72-B, 75-C, 88-A, 108, 118, 128, 135, 161, and 164. Federal Railroad Administration requirements may also be pertinent. 5-3

Please note that this response is submitted on behalf of the Traffic Engineering Section of the Commission's Rail Safety and Carriers Division only. It should not be construed as representation of the Commission nor any other division, branch, or section thereof.

We look forward to working with you during project implementation. Feel free to contact me at (415) 703-5933 for any further assistance.

Very truly yours,

Roy Evans

ROY EVANS
Transportation Engineer
Rail Safety and Carriers Division
Rail Engineering Safety Branch
Traffic Engineering Section

cc: State Clearinghouse

B. Kaneshiro, ENERGY
R. Futrell, RROS

Comment Letter 5

Roy Evans, Transportation Engineer
Rail Safety and Carriers Division
Rail Engineering Safety Branch
Traffic Engineering Section
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Response 5-1

Table 2-14 on page 2-74 is revised to add the suggested language describing the California Public Utilities Commission (CPUC) rail crossing authorization. The permit process described would be initiated during the final design phase of the project following certification of the environmental document.

TABLE 2-14

AGENCY APPROVALS
(Revised July 24, 1998)

Agency	Approval or Permit
California Public Utilities Commission (CPUC)	Permits required for all at-grade or **grade-separated** railroad, **highway, and street crossings as well as pedestrian crossings of light rail and railroad tracks; public hearings before the CPUC may also be required; a formal application to conform with CPUC Rules of Practice and Procedure (CPUC Code Section 1200) is required; a formal application requesting permission to deviate from the established CPUC General Order (G.O.) standard (such as those regarding the height requirements for overhead wire) must be submitted and approved by the CPUC**.

Response 5-2

The CPUC is correct in stating that CPUC authorization is required for all light rail/highway crossings, all light rail/railroad crossings and all light rail/pedestrian crossings, be they either at grade or grade separated. MUNI will be required to file formal applications with the CPUC requesting CPUC approval for all of these crossings. It is anticipated that MUNI will group several like crossing requests together under one application. For example, the five proposed light rail/freight railroad crossings will form one logical application package, since the same or very similar grade crossing protection rules and devices would be applied to these five crossings. Similarly, the 50+ light rail/ Third Street at grade crossings will likely be grouped into two or more application packages; the US 101 grade separation and nearby environs into another; and the Bayshore Terminal station area with its pedestrian crossings between the light rail and Caltrain stations another. It is recognized that the CPUC application and approval process is a rather lengthy one and MUNI's implementation schedule will take this requirement into account.

Accordingly, Table 2-14 has been revised as indicated in Response 5-1.

Response 5-3

The CPUC is correct in stating that any desired deviation from the requirements of the Commission's General Orders (G.O.) must also be requested and approved by the CPUC. For example, MUNI will need to request a deviation from G.O. 26-D and G.O. 95 for 18.5' traction power wire height clearances for its new light rail line over the five freight railroad crossings. The CPUC G.O. standard clearance height above freight railroad tracks is 22'6". However, due to the limiting height of the four railroad tunnels leading into San Francisco, the tallest locomotive or freight car that can physically enter San Francisco today is ~16'0", or 3'0" below MUNI's proposed traction power wire height for the new light rail line.

The CPUC statement that Federal Railroad Administration (FRA) requirements may also be pertinent would apply only to the proposed light rail crossings of the five freight railroad spurs/branch lines.

Accordingly, Table 2-14 is revised as indicated in Response 5-1.

Caltrain

1250 San Carlos Avenue
P.O. Box 3006
San Carlos, CA 94070

tel 650.508.6269
fax 650.508.6281

#6

May 19, 1998

Hillary E. Gitelman
Environmental Review Officer
Planning Department
1660 Mission Street
San Francisco, CA 94103-2414

Ms. Gitelman,

Caltrain would like to submit the following comments for the Third Street Light Rail Project DEIS/DEIR.

1. Caltrain is currently completing the Caltrain Rapid Rail Study. This study is a strategic analysis of capital improvements to the Caltrain right of way from San Francisco to Gilroy. A critical part of the Rapid Rail Study is planning for new and rehabilitated station facilities.

   As part of the Rapid Rail Study we are developing plans for a new Bayshore Station located just south of the existing station. The Muni LRT station should be designed to be consistent with Caltrain's planned station. The new Bayshore Station will have the following features:

   - Location will be south of the existing platforms to take the station off the curve;
   - Tracks will be spread to 18' on centers;
   - Center fence will be installed;
   - Pedestrian grade crossings will be installed at ends of station platforms;
   - Platforms will be 600 feet long with expansion possibility to 1,000 feet;
   - The UP freight tracks may be relocated;
   - Additional parking will be constructed if possible; and
   - Station will include standard amenities.

   A schematic drawing of Caltrain's planned improvements is attached to this letter. 6-1

   Construction of the Muni project would be a good opportunity to improve the Bayshore station to a full multimodal station. As with other major station improvement projects, Caltrain will look to the community and local transit agencies to develop facilities outside the basic railroad envelope. We look forward to working closely with Muni on planning this exciting station project. 6-2

2. While the Muni project will be a good opportunity for a major intermodal station it also raises certain concerns, especially safety. Caltrain is concerned that Muni patrons will cross the Caltrain tracks to access the new Bayshore Station creating a potential safety hazard. Therefore we request that Muni include fencing the Caltrain right of way in the station area and providing a convenient grade separated pedestrian and bicycle access route from the east side of the Caltrain tracks to the west side (location of the Muni station). Caltrain would consider participating in the design and cost of the grade separation if it also served the Caltrain station. 6-3

3. In order to maximize Third Street Light Rail connections with Caltrain at Fourth & King Streets, Caltrain would recommend that both the north and southbound tracks be placed upon the Fourth Street Bridge, as shown in Figure 2-14.

   Splitting the tracks between the Third and Fourth Street Bridges would force Third Street riders traveling in the northbound direction to walk a lengthy block to access the Caltrain station. This could include substantial numbers of patrons traveling from the Mission Bay area. This arrangement would also reduce the number of light rail options available to Caltrain patrons wishing to use Muni to access downtown and other locations throughout the city. 6-4

4. The issue of Third Street Light Rail integration with Caltrain is not discussed in the document. Caltrain would be pleased to work with the City as this project moves forward to develop service coordination strategies. 6-5

Caltrain would like to thank the City of San Francisco for our participation on the project's Technical Advisory Committee and for consideration of our comments on the project DEIS/DEIR. Caltrain will be happy to work with The City in the design of this exciting project.

Sincerely,

Darton Ito
Assistant Planner

c Jim DeHart
Darrell Maxey
Andy Nash
Walt Stringer

D:\caltrain\station planning\third street\3rd st lr deis deir comments.doc

Attachment

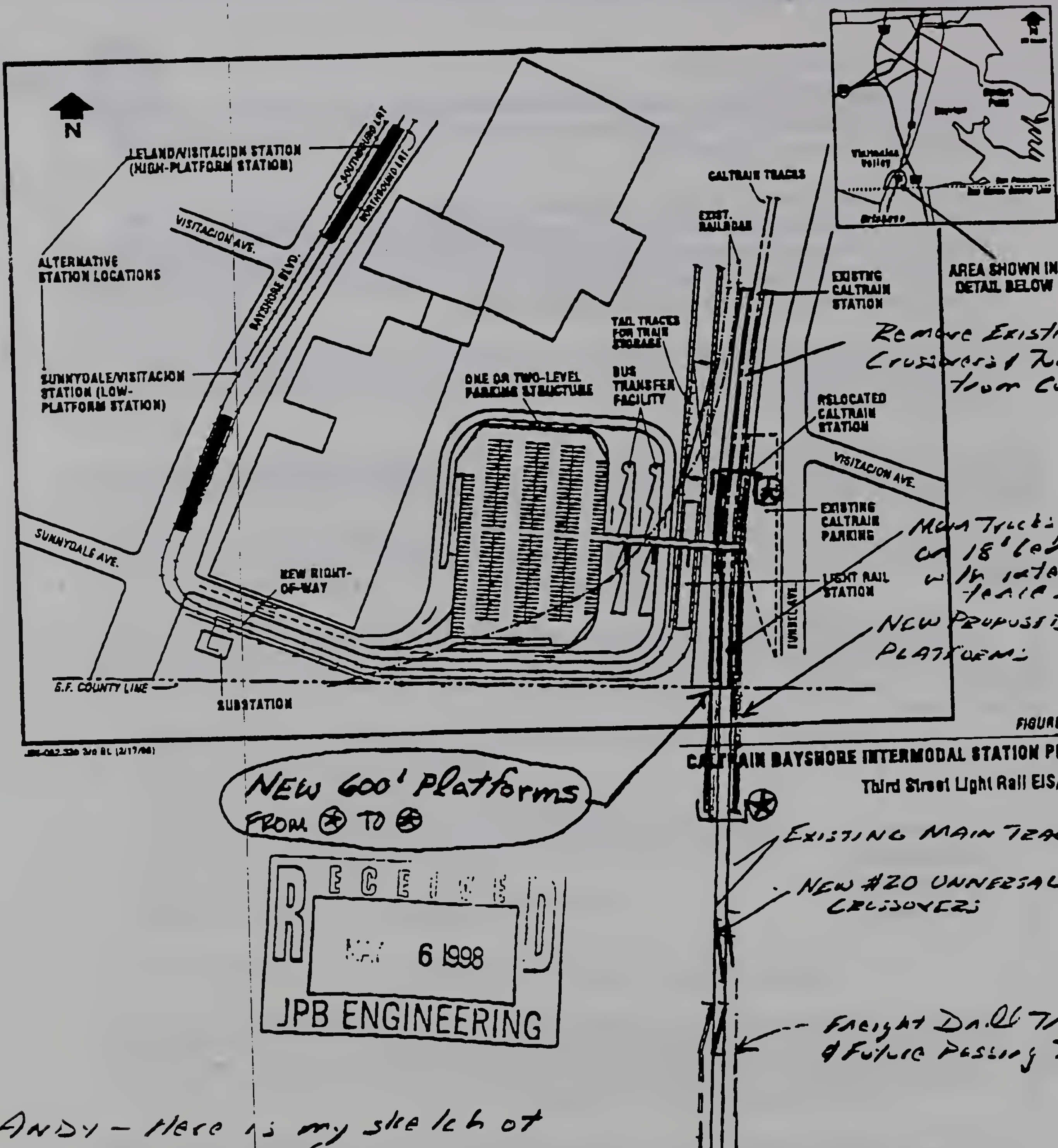

N
LELAND/VISITACION STATION (HIGH-PLATFORM STATION)
SOUTHBOUND LRT
NORTHBOUND LRT
VISITACION AVE.
BAYSHORE BLVD.
ALTERNATIVE STATION LOCATIONS
SUNNYDALE/VISITACION STATION (LOW-PLATFORM STATION)
SUNNYDALE AVE.
NEW RIGHT-OF-WAY
S.F. COUNTY LINE
SUBSTATION
ONE OR TWO-LEVEL PARKING STRUCTURE
TAIL TRACKS FOR TRAIN STORAGE
BUS TRANSFER FACILITY
CALTRAIN TRACKS
EXIST. RAILROAD
EXISTING CALTRAIN STATION
AREA SHOWN IN DETAIL BELOW
RELOCATED CALTRAIN STATION
VISITACION AVE.
EXISTING CALTRAIN PARKING
LIGHT RAIL STATION
TUNNEL AVE.
Visitacion Valley
Brisbane

FIGURE 2-7

CALTRAIN BAYSHORE INTERMODAL STATION PLAN

Third Street Light Rail EIS/EIR

Remove Existing Crossovers & Turnouts from Curve.

Main Tracks placed on 18' centers with inter-track fence.

NEW PROPOSED PLATFORMS

NEW 600' Platforms FROM ⊛ TO ⊛

EXISTING MAIN TRACKS

NEW #20 UNIVERSAL CROSSOVERS

Freight Drill Tracks & Future Passing Tracks

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MAY 6 1998
JPB ENGINEERING

ANDY – Here is my sketch of what Caltrain is proposing at Bayshore. All in All – Muni's future light rail plans are consistent with Caltrain's future plans. Believe Caltrain's future platforms will be two or three hundred feet farther to the south than shown on Muni's conceptual plans.

Darrell

Comment Letter 6

Darton Ito, Assistant Planner
Caltrain
1250 San Carlos Avenue
PO Box 3006
San Carlos, CA 94070

Response 6-1

Caltrain states that it is currently developing plans for a new Caltrain Bayshore Station located just south of their existing train station. Caltrain requests that MUNI design the new Bayshore light rail station so as to be fully compatible with the planned new Caltrain Bayshore Station, and then lists the pertinent features of the planned new Caltrain station.

MUNI intends to design and operate its new Bayshore intermodal station so that it is fully compatible with Caltrain's planned new Bayshore Station, and that the two rail stations facilitate easy passenger transfers between each other, as well as provide convenient transfers to local MUNI and SamTrans buses and, if constructed, park-and-ride facilities. MUNI will work closely with Caltrain to coordinate the final design, implementation and operation of this important new intermodal facility.

Response 6-2

Comment noted. The proposed intermodal facility at Bayshore Station is described on page 2-18 of the DEIS/DEIR.

Response 6-3

Comment noted. MUNI will work with the Joint Powers Board to ensure rider and pedestrian safety through proper signage and fencing at the proposed Bayshore intermodal station. However, grade-separated pedestrian and vehicle access routes are not proposed as part of this project.

Response 6-4

Comment noted. On June 23rd, 1998, the San Francisco Public Transportation Commission selected the option having the north and southbound tracks on the Fourth Street bridge as part of the Locally Preferred Alternative.

Response 6-5

Comment noted. MUNI will work with Caltrain during the final design of the Bayshore Station to develop service coordination strategies.

METROPOLITAN
TRANSPORTATION
COMMISSION

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Solano County and Cities

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Tom Torlakson
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Doug Wilson
Marin County and Cities

Sharon Wright
Sonoma County and Cities

Lawrence D. Dahms
Executive Director

William F. Hein
Deputy Executive Director

May 19, 1998

#7

Hillary E. Gitelman
Environmental Review Officer
Planning Department
City & County of San Francisco
1660 Mission St.
San Francisco, CA 94103-2414

RE: Third Street Light Rail Project Draft EIR/EIS

Dear Ms. Gitelman,

Thank you for the opportunity to comment on the above-referenced document. The project would extend the Muni Metro system 5.4 miles to the Caltrain Bayshore Station, serve 138,000 daily riders in 2015 (2,500 new daily transit riders), and cost $402 million, including a new maintenance facility. As the DEIR/DEIS points out, the project could help support revitalization of Mission Bay and the Bayview Hunters Point commercial core along Third Street. 7-1

The financial analysis in Section 7 of the DEIS assumes that system-wide operating costs can be covered through projected growth in "existing revenue sources." However, the DEIS also indicates that the light rail line will initially be more expensive to operate than the improved bus alternative, thereby exposing Muni to potential operating shortfalls in the short to mid-term (MTC's own financial analysis for the 1998 Regional Transportation Plan projects a cumulative operating deficit to be at least $215 million over the next 20 years). The DEIS would be strengthened with more discussion of how the short to mid-term operating cost increases will be addressed given that the DEIS also states that "maintaining the existing system is a very high priority for Muni in retaining its strong ridership base". 7-2

Operating costs are projected to increase an additional $3 million per year when the New Central Subway is added in 2013. The DEIS indicates that 50% of the funding for the combined Initial Operating Segment and New Central Subway, estimated to cost $866 million, would come from federal sources. Federal funds available from existing sources are distributed by formula and are used almost exclusively for rehabilitation of the existing system. A second federal source is New Rail Starts program which is discretionary. The FTA full funding grant agreements now committed to the BART-San Francisco Airport extension and Tasman light rail system will draw heavily on this fund source for the next 6 7-3 to 8 years. Beyond that, a regional process will be used to determine which other projects to advance for this highly competitive fund source.

If you have any questions regarding these comments, please contact Doug Kimsey of our staff at 510.464.7794

Sincerely,

Chris Brittle

Chris Brittle
Manager, Planning Section

cc: Commissioner Rubin
Commissioner Hsieh

Comment Letter 7

Chris Brittle, Manager
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607-4700

Response 7-1

Comment noted that the Project could support revitalization of Mission Bay and the Third Street commercial core.

Response 7-2

The DEIS/DEIR does indicate an operating deficit under current assumptions. The DEIS/DEIR states on page 7-19 that the incremental costs of operating and maintaining the service provided by light rail will be shared by several, existing sources of MUNI funds. A prospective strategy is identified, including fare revenues, parking revenue dedicated to MUNI, and General Fund revenues.

Response 7-3

As reflected on page 7-16 of the DEIS/DEIR, the City recognizes that there is a significant lead time required to secure federal New Starts funding. MUNI does not anticipate that construction would start on the New Central Subway until 2008. MUNI also expects to participate in the regional planning process which will address allocation of New Starts funds. Please note that the Third Street Light Rail Project is listed as eligible for design and construction under the New Starts Program in the new federal transportation legislation (TEA-21).

MOVING THE CITY
SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY

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Carmen C. Clark
Executive Director

May 18, 1998

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MAY 21 1998
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Hilary E. Gitelman
Environmental Review Office
City and County of San Francisco - Planning Department
1660 Mission Street
San Francisco, CA 94103-2414

Subject: Third Street Light Rail Project DEIS/DEIR Comments

Dear Hilary:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement/Report (DEIS/DEIR) on the Third Street Light Rail Project. As the funding agency for the project, we are gratified that a study of this magnitude has remained on schedule for two years. We believe the highly collaborative approach between MUNI and the Planning Department has made this possible. We are also quite pleased with the quality of the technical analyses in the document.

Our comments are circumscribed primarily to Financial Feasibility Analysis (Chapter 7). While the analysis is comprehensive and very well executed, there are some significant issues that we believe need to be pointed out, as they may affect policy level funding trade-offs that the City will need to make in order to be able to proceed with this project. The issues are discussed in the sections below.

The 1997 Stategic Plan Update for Prop. B (the City's half-cent sales tax for transportation) shows (page 8) a $24.9 million shortfall in the Prop. B funding amount needed for the 3rd Street Project. In our view, there are several different opportunities to deal with this issue. Some arise from revisiting cost assumptions, and some from reconsidering potential funding scenarios. The significance for the Prop. B program lies in the fact that the 3rd Street project is the cost driver for decisions about the need for outside financing. One potential source of funds to close this gap is the Prop. B line item for MUNI vehicles. However, MUNI has not yet resolved the issue of sole source procurement of the next LRV contract. It would not be prudent to assign funding from this category to 3rd Street until there is resolution on the sole source procurement issue. Before a schedule of contributions from Prop. B to the 3rd Street project is agreed upon, we would like to make sure that all relevant options and potential trade-offs have been carefully scrutinized. 8-1

Table 7-10 in the DEIR/DEIS includes line item 3.b. for $24.9 million, for the acquisition of land for the maintenance facility. It is our understanding that this would be to obtain a 60-year lease from the Port of San Francisco, and that the funds would be needed up front. The required amount would probably come out of the 3rd Street Capital Construction fund in Prop. B. In our view 8-2

8.2 this is an artificial cost which amounts to a transfer of funds within City coffers (between MUNI and the Port). This is further complicated by the fact that the Port does not yet own the property. The opportunities in this regard are about re-thinking the rationale for this payment from one City department to another, and, should the payment be required, revisiting the terms of the proposed lease, specifically to reduce the cost and/or lengthen the period of time for payment, spreading the burden over many years and postponing the need for outside financing.

8.3 Also in Table 7-10 there is a detail of costs associated with providing LRT service to the Mission Bay development. As the text states, items 5 and 6 (light rail vehicles and turnback facility) would not be needed until the year 2015. The Table shows that $38 million would be needed for the additional 10 vehicles to provide service to Mission Bay. It is our opinion that the separate purchase of 10 LRVs may not be viable, and that it would make better economic sense to have these included in the proposed procurement of 59 LRVs, together with the 25 needed for service directly on 3rd Street. If a joint procurement were to occur, it would probably take place sooner, rather than later in the schedule for implementation of 3rd Street, so we would expect that the cost per unit would be closer to the current $2.8 million. This could result in cost savings of around $10 million. The EIR should address the issue of potential private sector contributions to the project, including key assumptions, timing and amounts, given the direct linkage between the Mission Bay development and the need for the additional service. The same also applies for item 6, the Mission Bay Turnback, which is intended to enable short line service between Mission Bay and the MUNI Metro tunnel along Market Street.

8.4 Finally, in July the Authority will initiate a value engineering exercise on 3rd Street, to try to identify main cost reduction opportunities. With regard to this issue, the DEIS/DEIR should clarify the magnitude and cost of Phase 2 of the proposed maintenance facility, and provide further details about the cost components of Phase 1.

Thank you for the opportunity to comment. Should you have any questions about the issues raised in this letter, please call José Luis Moscovich, at 557-6857.

Sincerely,

Carmen C. Clark

Carmen C. Clark
Executive Director

Comment Letter 8

Carmen Clark, Executive Director
San Francisco Transportation Authority
100 Van Ness Avenue, 25th Floor
San Francisco, CA 94102

Response 8-1

The revenue shortfall identified by the San Francisco Transportation Authority is based on the Proposition B 1997 Strategic Plan Update, which was adopted in December 1997. MUNI's assumptions of sales tax growth and inflation turned out to be more optimistic than the Transportation Authority's analysis. MUNI intends to work closely with the Transportation Authority to address the identified shortfall with a combined cost/revenue approach. Potential cost savings will be identified and evaluated as part of an intensive value-engineering exercise, which the Transportation Authority has already made a commitment to do. In addition, MUNI will pursue cost-sharing arrangements for such project elements as utility relocation, street resurfacing, lighting and other general betterments and amenities with City departments and developers in the Corridor. MUNI will explore the feasibility of a sole-source vehicle procurement that could result in significant cost savings to the project. MUNI will also re-evaluate the parking needs and configurations at the project's southern terminus, which may also result in cost savings.

On the revenue side, MUNI will investigate and pursue additional external funding sources as appropriate. The FY 2000 State Transportation Improvement Program, a traditional expansion fund source, is one example of a potential for contributing additional funds to the project. Other City sources may be tapped, as stated above, for utilities, street trees and other elements of the project.

Response 8-2

MUNI has identified a preliminary cost for the acquisition of land for the Metro Easy facility of $24.9 million. However, the final cost and terms of this acquisition will not be finalized until after the San Francisco Transportation Authority, the Port of San Francisco, MUNI and the Mayor's Office reach agreement on the extent and timing of the transaction.

Response 8-3

Discussions between MUNI and the Redevelopment Agency as well as private developers in Mission Bay regarding contributions to the light rail project have been initiated and will continue over the next year.

Response 8-4

The San Francisco Transportation Authority states that they will initiate a value engineering exercise on the project to see if there are any significant opportunities for cost reduction. The Authority also would like to see a more detailed cost breakdown for both Phases 1 and 2 of this facility.

Detailed cost breakdowns for both Phases 1 and 2 of the Metro East facility are contained in the final *Conceptual Cost Estimates Working Paper #5A* (November 1997), available for review at the San Francisco Planning Department, under the tab labeled "Metro East Yard & Shops, Plus Related Shoreline Improvements". Summary cost tables along with detailed back-up estimates are provided. Phase 1 is shown as costing $107.2 million in January 1997 Dollars, while Phase 2 is shown as costing $31.3 million.

Accordingly, the following paragraph will be added to the DEIS/DEIR after the first paragraph of page 2-72, Section 2.5.2, Capital Cost Summary:

> **The total capital cost for the IOS includes $107.2 million (1997 Dollars) for the Phase 1 construction of the new LRV maintenance facility as follows:**
>
> - **Engineering and management;**
> - **Right-of-way acquisition/lease;**
> - **Preparation of the entire 13+acre site for construction (soil stabilization);**
> - **Construction of yard storage tracks for approximately 60 LRVs;**
> - **Construction of a maintenance shop building; and**
> - **Contingency**
>
> **To complete the new maintenance facility, Phase 2 would add yard storage tracks and expand the shop building(s) to accommodate approximately 40 additional LRV's.**

PUBLIC UTILITIES COMMISSION
CITY AND COUNTY OF SAN FRANCISCO

WILLIE L. BROWN, JR.
MAYOR

ANSON B. MORAN
GENERAL MANAGER

HETCH HETCHY
WATER AND POWER

SAN FRANCISCO
WATER DEPARTMENT

SAN FRANCISCO
CLEAN WATER PROGRAM

May 19, 1998

#9

Subject: Third Street Light Rail
Draft EIS/EIR
Case Number 96.281E
Written Comments

RECEIVED

MAY 19 1998

CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
ADMINISTRATION

Mr. Brian J. Kalahar
Environmental Planner
San Francisco Planning Department
1660 Mission Street, Fifth Floor
San Francisco, CA 94103-2414

Dear Mr. Kalahar:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement/ Environmental Impact Report for the Third Street Light Rail Project.

Specifically, our comments relate to Chapter 5.0: ENVIRONMENTAL CONSEQUENCES AND MITIGATION MEASURES - Section 5.7 UTILITIES AND ENERGY: Section 5.7.2 IMPACTS TO MAJOR UTILITY LINES, Page 5-39:

The **Light Rail Alternative - Initial Operating Segment**, Construction Impacts, indicates impacts to four major subsurface PG&E gas pipelines. Along almost the entire length of Third Street, sewer pipelines run down the centerline of the street. In order to be able to repair and maintain those sewer lines and to avoid conflict with the proposed Light Rail tracks, the sewer lines will have to be relocated. The Utilities Engineering Bureau of the San Francisco Public Utilities Commission believes that the relocation of the sewer lines is required as a direct consequence of the construction of the Third Street Light Rail Project and as such should be a project cost borne by the Municipal Railway (and the Federal Transit Administration). 9-1

In certain segments of the Project alignment, existing sewer pipelines may be structurally inadequate or are of insufficient capacity to meet anticipated sanitary or stormwater flows and must be enlarged. Discussions are now underway between the Utilities Engineering Bureau and the Municipal Railway Capital Projects to identify those sewer lines which are structurally inadequate or insufficient capacity and must be upgraded. Those sewer lines which will require additional capacity, as a direct result of stormwater runoff from planned Municipal Railway facilities (such as the proposed Western Pacific Maintenance Facility), would be upgraded by cost sharing. Negotiations are planned between the Public Utilities Commission and the Municipal Railway to identify costs attributable to the Third Street Light Rail Project and those costs attributable to other anticipated sewer system demands (Mission Bay Project, for example). 9-2

UTILITIES ENGINEERING BUREAU
1155 MARKET STREET, 5TH FLOOR • SAN FRANCISCO, CALIFORNIA 94103 • (415) 554-0702

Other Comments:

Chapter 4.0 AFFECTED ENVIRONMENT.
Section 4.8.2, EXISTING SURFACE WATER WITHIN THE CORRIDOR, Page 4-64, Second Full Paragraph, Fourth Sentence: We believe this statement is incorrect ("The only portions of the study area that are not currently connected to the combined sewer system...") because our records indicate the Western Pacific Site is not connected to the City system. 9-3
Page 4-64, Third Full Paragraph, Second Sentence: Again, we do not think stormwater from this Site flows into the storm sewer drains.

Chapter 5., ENVIRONMENTAL CONSEQUENCES AND MITIGATION MEASURES.
Section 5.7 UTILITIES AND ENERGY, Subsection 5.7.2. IMPACTS TO MAJOR UTILITY LINES.
Page 5-41, Western Pacific and Cargo Way Maintenance Facility Sites. We believe this statement that "no existing, major utilities would be affected..." is incorrect. The undersized sewer pipe, which runs under Third Street, is being augmented by the construction of the new sewer line under Illinois Street. Addition of stormwater runoff from the proposed Western Pacific Maintenance Facility site would have a definite impact on the Third Street sewer. This 9-4
discussion may need to describe the new sewer line and as a mitigation measure increase in the size of the new sewer to accommodate the stormwater flow from the new Facility.
If the stormwater is not going directly into the combined sewer system, the document may need to discuss a "first flush" system that might have to be developed related to development of the Port Property. You may want to talk to Beth Goldstein, Bureau of System Planning and Regulatory Compliance at 554-8945 about the "first flush" system being considered for Mission Bay and Candlestick Park and being constructed for the Giants Stadium.
Section 5.9, HYDROLOGY AND WATER QUALITY
Subsection 5.9.2 INCREASES STORM WATER RUNOFF,
Page 5-54, Western Pacific and Cargo Way Maintenance Facility Sites: This section may need to include a discussion about an application that may be filed by the City for an NPDES Stormwater Permit from the Regional Water Quality Control Board for the areas (including Port Property) which are not connected to the combined storm drain/sewer system. 9-5
The discussion in this subsection assumes that the proposed maintenance facility sites will be connected to the City's combined system, which may or may not be true depending on the on-going discussion between our two departments.

Chapter 6.0 CEQA FINDINGS OF SIGNIFICANCE
Section 6.2 SUMMARY OF CUMULATIVE IMPACTS
Subsection 6.2.2 LOCAL CONTEXT
Page 6-3, Second Paragraph: The discussion of other projects such as Mission Bay redevelopment and the Moscone Center expansion and the temporary cumulative traffic disruptions resulting from those projects does not include a discussion of the proposed Sunnydale Sewer Improvement Project. The project, which would involve both open cut and tunneling in the area from Bayshore Boulevard east to the end of Sunnydale Avenue, would be constructed over a two year period starting early in the year 2000. This construction schedule is concurrent with the anticipated schedule for the Initial Operating Segment. While we agree that the cumulative construction impacts would be temporary and not significant, coordinated scheduling of the two projects (particularly at the end of Sunnydale Avenue east of Bayshore Boulevard and the site of the proposed Bayshore Intermodal Station) will be essential to reduce any cumulative impacts. 9-6

Thank you for your consideration of these comments. If you have any questions, I can be reached at (415) 558-4025.

Sincerely,

Manfred M. Wong
Project Manager

cc: Norman Chan, Hydraulics Section, Department of Public Works
Andrew J. Howard IV, P.E., Capital Projects, Municipal Railway
Everett Hintze, Acting Manager, Utilities Engineering Bureau

Comment Letter 9

Manfred Wong, Project Manger
San Francisco Public Utilities Commission
Utilities Engineering Bureau
155 Market Street, 5th Floor
San Francisco, CA 94103

Response 9-1

As stated in Section 2.4.3, page 2-59 of the DEIS/DEIR, underground utilities located in the light rail alignment would be relocated to the curb-parking lane as part of pre-construction activities. The cost for project-related relocation, where necessary, would be borne by MUNI. MUNI/DPW/PUC will begin a process to identify cost sharing where PUC wants to concurrently replace existing, worn sewer facilities along the alignment based on an assessment of needs currently being undertaken by the City.

Response 9-2

Comment noted. See Response 9-1. Also, MUNI is currently in negotiation with the San Francisco Public Utilities Commission to enlarge the planned sewer line under Illinois Street to accommodate the waste water generated by the proposed light rail maintenance and storage facility at the Western Pacific site. Specific changes to the text are indicated in Responses 9-3 and 9-4.

Response 9-3

In Section 4.8.2, the DEIS/DEIR identifies the portions of the Corridor that are not currently connected to the City's combined sewer system. The second paragraph and Footnote #93 on page 4-64 are revised to clarify that the Western Pacific site for the new light rail maintenance facility is part of the Port property on this list.

> The only portions of the study area that are not currently connected to the combined sewer system are the east side of The Embarcadero between Mission Street and Broadway, Terry Francois Boulevard, and a portion of the landward Port property, **including the Western Pacific site for the proposed light rail maintenance facility**.
>
> [93] Lociano J., Section Manager, Environmental Engineering, San Francisco Department of Public Works, Southeast Water Pollution Control Plant, Personal communication with BASELINE, 20, November, 1996; **Wong, M., Project Manger, Utilities Engineering Bureau, San Francisco Public Utilities Commission, telephone conversation, June 1998.**

Although no mitigation measures are required for utilities for the Light Rail Alternative- IOS, the third paragraph on page 5-40 of the DEIS/DEIR is revised to indicate that the Light Rail Alternative will bear the cost of utility reinforcement/protection, as well as relocation, during construction of the IOS.

Mitigation Measures

None required. All project-related utility relocation **and reinforcement/ protection of existing utilities that do not have to be relocated** would be a project cost as identified in the Conceptual Capital Cost Estimate.[16]

Response 9-4

The discussion of impacts to major utility lines in Section 5.7.2 of the DEIS/DEIR does not mention that the existing sewer system lacks the capacity to accommodate a new light rail maintenance facility at the Western Pacific site. Because flows from the Western Pacific site would be directed to the City's combined sewer system for the first time, they would have the potential to increase the volume and frequency of overflow events. The analysis of this potential concluded that the additional influent would have a negligible effect on overflows, and no significant effect would occur. (See DEIS/DEIR Section 5.9.2, p. 5-55).

The Mission Bay SEIR identified a 0.2% increase in Combined Sewer Overflow (CSO) volumes as a result of increased sanitary sewage and drainage changes in Mission Bay South, and conservatively concluded that this increase would represent a measurable contribution to a significant cumulative impact, requiring mitigation. According to Beth Goldstein at the PUC, the increase in CSO volumes as a result of storm flows from the 13 acre Western Pacific site would be substantially less than those from Mission Bay, and would be within the range of uncertainty of the Bayside Planning Model, which is used to predict overflows and plan system improvements. (Beth Goldstein, Public Utilities Commission staff, personal communication with Hillary Gitelman, August 12, 1998.)

The second paragraph on page 5-41 is revised to identify the work planned to provide sufficient sewer capacity in this area.

> No existing, major utilities would be affected at the Western Pacific or Cargo Way sites, **except for the combined sewer system on Third Street. Additional capacity will be provided by the construction of a new sewer line on Illinois Street. The diameter of the planned line will be expanded from 60 to 66 inches to provide sufficient capacity to accommodate the proposed light rail maintenance facility at the Western Pacific site. The Municipal Railway is negotiating with the San Francisco Public Utilities Commission to share the cost for a portion of the planned sewer project**.

Response 9-5

Section 5.9.2 of the DEIS/DEIR states that runoff from the Western Pacific site will be discharged to the City's combined sewer system. The fourth paragraph on page 5-54 is revised to clarify that the drainage system for the light rail maintenance facility at the Western Pacific site will be connected to the combined sewer system.

> The Light Rail Alternative would include the construction of a drainage conveyance system designed to collect runoff from the maintenance facility. The runoff could be discharged to the City's combined storm drain/sewer system **after a connection to the planned Illinois Street sewer is provided**.

Response 9-6

Section 6.2.2 discusses cumulative construction impacts resulting from the construction of the Light Rail Alternative. It does not specifically identify the Sunnydale Sewer Improvement Project, which may occur in the area of the Caltrain Bayshore Station at the same time the light rail line is being constructed. Although the cumulative effect of this sewer improvement project would be temporary and not significant, the second paragraph of page 6-3 of the DEIS/DEIR is revised to mention the simultaneous construction schedules.

> As construction of the IOS begins in 2000, Mission Bay redevelopment and Moscone Center expansion**, possibly the Sunnydale Sewer Improvement Project,** and the new baseball ballpark and football stadium also will be under construction.

City and County of San Francisco

Willie Lewis Brown, Jr., Mayor
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Department of Public Works
Project Management Division
30 Van Ness Avenue, 5th Floor
San Francisco, CA 94102-6020
Kathryn How, Assistant City Engineer

May 20, 1998

#10

Mr. Brian Kalahar
Department of City Planning
1660 Mission Street, 4th Floor
San Francisco, CA 94103

Dear Mr. Kalahar:

The following are Department of Public Works comments on the 3rd Street Light Rail Project EIR/EIS. These comments focus on Auxiliary Water Supply System, constriction activities and historic issues on the 4th Street bridge and road grade and paving concerns.

AWSS

- Section 4.6 Utilities Page 4-52 needs to be revised to identify the Fire Department as the operator of the Auxiliary Water Supply System not the Water Department. 10-1
- Page 4-54 and 4-55 table 4-9 needs to identify the AWSS in the 3rd Street right-of-way from Salinas to Palou St. and from 25th to the Mission Creek channel on both 4th Street and 3rd Street. On Cargo Way from 3rd Street to Mendell St. On 4th Street from the 3rd Street to Brannan, 3rd Street from King to Market and on Stockton and Kearny Streets. Please refer to the attached drawing for general location and utility maps previously submitted for specific details of line sizes and alignments. 10-2
- Page 5-39 Section 5.7.2 need to include a statement on relocation or protection of AWSS lines as part of the IOS in the locations stated above. 10-3

Transportation Analysis

- Section 3 need to discuss or identify roadway work, street rebuilding etc. due to the new rail work (i.e. grade changes causing reconstruction). The pavement restoration costs are included in Table 2-12 Capital Cost Summary. 10-4

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4th Street Bridge

The 4th Street Bridge is a system of three structures. North and South Approaches and a Bascule type lift bridge. The bridge and its approaches are in a deteriorated condition and will need to be rebuilt or modified to some degree to support light rail beyond what is proposed for DPW's seismic rehabilitation project. There are a number of utilities that currently cross the channel and the rail project also will require submarine power crossing at the channel. The light rail project improvements including overhead power supports, rails and decking modifications to support rails are not part of the DPW project and need to be addressed in EIR/EIS. Specific comments are as follows: 10-5

- Page 4-37, Table 4-5 needs to include the 3rd Street and 4th Street Bridge as community facilities;
- Page 5-26, Light Rail Alternative ISO Construction impacts needs to identify the Light Rail project elements and impacts to the 4th street Bridge separate from DPW's rehabilitation project. Also this information needs to be carried forward into any consultations and reports prepared to SHPO.

Please contact me if information or clarification is needed to address the Department's concerns.

Sincerely,

Frank V. Filice
Principal Analyst

c: Kathy How, Assistant City Engineer
Chief Kalos, Fire Department
Sue Olive, MUNI
Peg Divine, MUNI

FVF/ec

Comment Letter 10

Frank Filice, Principal Analyst
Department of Public Works
Project Manager Division
30 Van Ness Avenue, 5th Floor
San Francisco, CA 94102

Response 10-1

Section 4.6 identifies the primary utilities serving the Corridor. In order to distinguish the operators of the City's potable and auxiliary water systems, the fourth paragraph on page 4-52 is revised.

> 2) City and County of San Francisco Water Department potable ~~and auxiliary~~ water lines **and San Francisco Fire Department auxiliary water lines;**

Response 10-2

Major utility lines in the Corridor, those most likely to be affected by project implementation, are listed in Table 4-9 on pages 4-54 and 4-55 of the DEIS/DEIR. A more extensive listing of utilities in the Corridor is provided in the *Third Street Light Rail Project Conceptual Capital Cost Estimates.* The drawings and utility maps that identify the Auxiliary Water Supply System lines will be incorporated into the Project's technical documentation, available for review at the San Francisco Planning Department.

Response 10-3

Section 5.7.2 identifies the major underground utilities that would be directly affected by construction of the Light Rail Alternative. The auxiliary water supply lines are adjacent to the curb and are not affected by construction of light rail in the center of the street. Relocated utilities would be placed above or to the side of the auxiliary water supply lines. During relocation of affected utility lines from the center of the roadway to the curb, the location of the auxiliary water lines would be routinely monitored to ensure that no damage to these lines would occur (refer to Response 9-3).

Response 10-4

The construction methods for the Light Rail Alternative are summarized in Section 2.4.3. The text states that for the IOS, roadway construction, in general, would occur sequentially from the northern to the southern ends of the Corridor. One side of the street would be in construction and repaved prior to work commencing on the other side of the street. The costs for this work are included in Table 2-12 on page 2-71 of the DEIS/DEIR. A description of surface construction impacts and their effect on traffic circulation is presented in Section 3.2.2.

Response 10-5

Table 4-5 on page 4-37 of the DEIS/DEIR lists the community facilities located in the Corridor. Since infrastructure is not considered an institutional facility, the Third and Fourth Street bridges are not included under Community Facilities and Services. They are described in Section 2.4.1, Light Rail Alternative – IOS, and in Section 5.5.2, Historic Property Impact.

Section 2.4.1 presents the IOS alignment and traction power requirements as well as other facilities associated with the Light Rail Alternative. The alignment description includes the light rail crossing of Mission Creek on the Third and Fourth Street bridges. On page 2-30, the DEIS/DEIR states that adding light rail to these bridges would not require additional major strengthening of the bridges beyond the rehabilitation and seismic upgrade planned by the Department of Public Works. However, some structural modifications may be required to strengthen the bridge deck (refer to *Study to Investigate the Structural Condition of Three Existing Bascule Bridges Crossing Mission and Islais Creeks and the Third Street/Bayshore Boulevard Bridge Crossing U.S. Highway 101*, available at the San Francisco Planning Department). To clarify that the Light Rail Alternative would add track, overhead wire, and support poles to the rehabilitated bridges, as well as requiring strengthening of a bridge deck, the second paragraph on page 2-30 is revised.

> ~~Adding light rail to the bridge is not expected to require any major strengthening of the bridge structure since, in the past, streetcars operated across this span.~~ **No major modifications to the Fourth Street bridge are required solely to carry light rail traffic. As defined in the Locally Preferred Alternative, this bridge will carry two light rail tracks. As a result, some additional structural modifications may be required to strengthen the bridge deck. Strengthening of the bridge foundations will not be required for two tracks of light rail traffic. The steel structure of the bridge has been determined during preliminary engineering to be adequate for the loading of the LRVs and the main changes would be some additional steel to the floor stringers to carry the point load of the vehicles.**

This description of the additional light rail facilities to be included on the Third and Fourth Street bridges is reiterated in Section 5.5.2, which identifies potential historic property impacts. The DEIS/DEIR states that the addition of tracks and overhead wires to the bridges would be in keeping with their original historic design and, therefore, would not produce an adverse effect on the bridges (refer to Volume 1, Appendix F). The final design for the bridges will provide the carrying capacity for two-car light rail trains. However, to clarify that the Department of Public Works improvements to the Third and Fourth Street bridges do not include the facilities for light rail, the third paragraph on page 5-26 is revised.

> The Third and Fourth Street lift bridges are in need of seismic upgrade and rehabilitation. The San Francisco Department of Public Works is currently designing the improvements ~~for these two bridges~~ that**, when completed, will allow the placement of light rail track, overhead wire, and support poles on the Fourth Street bridge and** will have carrying capacity for two-car light rail trains.

In addition, Section 2.4.1 (page 2-44) of the DEIS/DEIR acknowledges that the Light Rail Alternative will require placement of new underwater cable at the bottom of Mission and Islais Creeks to provide a continuous flow of electric power along the alignment when the lift bridges open. Construction impacts for laying the underwater cable are discussed on page 5-51 of Section 5.9, Hydrology and Water Quality, and on page 5-58 of Section 5.10, Biological and Wetland Resources.

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CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
ADMINISTRATION

#11

May 19, 1998

Hillary E. Gitelman
Environmental Review Officer
Planning Department
City and County of San Francisco
1660 Mission Street
San Francisco, CA 94103-2414

Re: SF Case File No. 96.281.E; State Clearinghouse #96102097

Dear Ms. Gitelman:

Thank you for the opportunity to comment on the **Draft Environmental Impact Statement/Report on the Third Street Light Rail Project.** In light of the City of Brisbane's existing and planned land uses, the City is generally supportive of a project that will provide increased transit access to and from southeastern San Francisco and Brisbane. However, given the complexity of the proposed project and major pending land development proposals in the City of Brisbane, we request that the public comment period be extended so that we may work in cooperation with the City and County of San Francisco. 11-1

Our main concerns are as follows:

- The project, as defined, would diminish the traffic capacity of Third Street, the Highway 101/Third Street/Bayshore Boulevard interchange and/or Bayshore Boulevard. 11-2
- The Draft EIS/EIR fails to differentiate the more-significant construction impacts of the proposed grade-reducing cut-and-fill operation south of Jamestown Avenue from the lesser construction impacts for the rest of the Third Street Light Rail Initial Operating Segment. 11-3
- The Draft EIS/EIR contorts to identify mitigation measures for traffic/transit impacts for Segment 1 of the Third Street Light Rail IOS, and then provides insufficient analysis to assure that the recommended mitigation measures are credible and will not create additional traffic/transit impacts of their own. 11-4

- The Draft EIS/EIR finds that the proposed Third Street Light Rail Alternative IOS will not provide improved transit service between Visitacion Valley/Little Hollywood and Downtown in comparison to the existing 9X/9AX/9BX-San Bruno Muni bus lines. 11.5

- The Draft EIS/EIR fails to consider the "environmentally superior alternative" (page 6-4) of a previously proposed southern route that avoids the proposed route's impacts. 11.6

- The City of Brisbane is in the process of considering a development proposal by Universal Paragon in its 600-acre vacant Redevelopment Area southeast of the proposed Third Street Light Rail terminus. East of the terminus across Highway 101, the City and County of San Francisco is considering a 1.5 million sq. ft. mall/stadium project. The need for transit to serve these projects suggests that the terminus station be relocated to provide sufficient area for a larger multimodal transit facility to better serve the Project Goals and Objectives. In light of the above, the City of Brisbane feels that there may be an opportunity to refine the southern segment of the proposed project for our mutual benefit. In light of the foregoing, please evaluate the alternative route and terminus location described herein as part of your Response to Comments. 11.7

The proposed Segments 1 and 2 (south of Gilman Avenue) of the Third Street Light Rail will result in a number of adverse environmental impacts during its construction and operation phases. 11.8

Due to the existing topography of the ridgeline running between Bayview and McLaren Parks, the proposed Segments 1 and 2 of the route south of Jamestown Avenue require substantial cut and fill work in a developed and heavily-traveled area. Specifically proposed are a 900 ft. long, 6-8 ft. deep cut down the middle of Third Street; 705 ft. long, 6 ft. high retaining walls in the middle of Bayshore Boulevard; an additional retaining wall east of Bayshore Boulevard of unspecified size; an 800 ft. long, 30 ft. high retaining wall upslope of the northbound Highway 101/Third Street off ramp; and widening of the Highway 101 overcrossing. All this work will result in significant construction-related impacts to adjacent existing homes and businesses (not specifically addressed by the Draft EIS/EIR, pages 5-79 through 5-81), as well as substantial construction costs (Table 2-12, page 2-71). The proposed construction activity and subsequent reduction in the number of through lanes and elimination of left 11.9

turn lanes will significantly disrupt existing traffic patterns for buses, cars and trucks during and after construction (pages 3-32, 3-33, 3-40 through 3-43, 3-51). 11-9

The adverse traffic impacts for Segment 1 are most evident at the skewed intersection of Bayshore Boulevard with Arleta, Blanken and San Bruno Avenues. This intersection has a higher existing daily traffic volume than most of Third Street (page 3-14 & Table 3-1). With 6 travel lanes (not counting left turn lanes), it currently is able to operate at Level of Service C (page 3-15) . Given development projected to the year 2015, the proposed Third Street Light Rail would worsen the projected LOS rather than improve it (Table 3-9 & page 3-42). 11-10

To mitigate this significant adverse impact (which results in part because the Third Street Light Rail would preclude currently-permitted left turns from southbound Bayshore Boulevard to Tunnel Avenue, diverting them, instead, to Blanken Avenue via a new left turn signal), the Draft EIS/EIR (page 3-46) recommends that left turns from eastbound Arleta Avenue to northbound Bayshore Boulevard be prohibited. This, in turn would require re-routing of the 9X/9BX-San Bruno Muni bus lines, besides some reconfiguration of Arleta Avenue (not noted in the Draft EIS/EIR), presumably either by converting it into an eastbound right-turn-only lane or realigning it as a continuation of the currently offset Blanken Avenue at the other side of the intersection. 11-11 The Draft EIS/EIR further recommends that eastbound traffic desiring to turn left onto northbound Bayshore Boulevard be diverted to Raymond Avenue, for which a new left turn lane would be created across the former Bayshore Boulevard median (to be occupied by the Third Street Light Rail). Presumably, this, too, would require a new left turn signal, but the Draft EIS/EIR neglects to analyze the LOS impact of this additional signal phase. 11-12

A second example of the adverse traffic impacts for Segment 1 is the intersection of Bayshore Boulevard with the north end of Hester Avenue, just south of the Highway 101 overcrossing. This intersection is already a complicated mix of traffic entering and exiting the freeway, merging from and diverging between Bayshore Boulevard and Third Street, and turning left in four different directions from one shared lane. While the Third Street Light Rail would typically occupy both the #3 southbound and #3 northbound lanes, at this location a "shift in the alignment" (page 2-21) would occur so that the tracks and the #2 northbound lane would cross, exchanging positions. Even with additional signalization to control all of these "complex turning movements" (page 2-21), the result would be LOS F for the southbound left-turn movement (page 3-42), which is unacceptable (page 3-15). 11-13

To mitigate this significant adverse impact, the Draft EIS/EIR appears to recommend that the #2 southbound lane "be delineated to serve both left-turning and through vehicles (if deemed feasible during final design)" (page 3-47). No alternative mitigation is offered if this is not deemed feasible, and it is questionable how traffic flow is improved by potentially impeding one of only two through lanes serving traffic from southbound Bayshore Boulevard and Third Streets, as well as the southbound Highway 101 off ramp (Figure 2-8). 11-14

This difficulty the Draft EIS/EIR has in identifying credible mitigation measures (other examples being the recommended Meade Avenue shuttle, pages 3-33, 3-34, and the recommended Keith Avenue extension, Figure 2-8 and page 3-43) for these traffic impacts for Segments 1 and 2 south of Gilman Avenue makes clear that another, environmentally-preferable route must be identified. 11-15

This is particularly evident when the Draft EIS/EIR shows that the proposed Third Street Light Rail Initial Operating Segment will not adequately address the transit needs in the Visitacion Valley and Little Hollywood neighborhoods. According to pages 3-2 through 3-7 of the Draft EIS/EIR, the Bayshore Boulevard section (Segment 1) of the proposed Third Avenue Light Rail route is already served by six Muni bus lines. Of these, the 9X/9AX/9BX-San Bruno Expresses appear to be filled to greater capacity by Visitacion Valley residents than the 15-Third line. This is understandable since, for example, the morning San Bruno Express can get to Kearny/Pacific Avenues in 30 minutes, while the 15-Third takes 54 minutes just to get to Stockton/Clay Avenues. Rather than duplicating the central section of the existing 15-Third line with the proposed Third Street Light Rail line, the Visitacion Valley and Little Hollywood areas would be better served by adding more buses to the existing 9X/9AX/9BX/9-San Bruno Muni bus lines. 11-16

The Draft EIS/EIR's "Estimated Weekday Transit Ridership" Table 3-6 (also page 3-32, second & third paragraphs) bears this out. The Third Street Light Rail ISO is projected in the year 2015 to carry 4,520 fewer riders than would the 15-Third Muni bus line it would replace, while the 9X/9AX/9BX would carry 4,680 more if the Third Street Light Rail is built than if it is not. 11-17

The Third Street Light Rail's southern terminus is proposed at an obscured location currently under various ownerships and occupied by existing structures, including an operational business and freight railroad spur track. Site acquisition costs will include relocating the existing business and either negotiating a "satisfactory solution" (page 3-55) to the freight spur situation or reducing the proposed number of parking spaces and bus bays at the Caltrain Bayshore Station. Due to this site's limited area, structured parking may be a necessity. 11-18

This "deadend" location would not be conducive to future extensions to Candlestick Point or the Balboa Park BART station (page S-4), addressed in the 1993 Bayshore Transit Study . 11-18

These inadequately mitigated impacts and functional deficiencies make clear the need to consider an environmentally and financially preferable alternative to the proposed Segments 1 and 2--the Gilman Avenue/Candlestick route identified as "Refined Alternative 10" in the 1993 Bayshore Transit Study, which this Draft EIS/EIR fails to analyze. That alternative route would use broad, relatively flat Gilman Avenue to accommodate direct service to the future Candlestick Mills Mall and new 49ers stadium, addressing the traffic impacts of these two projects while improving access to the employment opportunities they promise for residents of the Third Street corridor. In addition, this route would avoid the grading, construction and traffic complications of the Bayshore Boulevard route. This alternative route could extend from Candlestick down Harney Way to San Francisco Executive Park, still under development, where the existing 56 Muni bus line could provide connecting service to the existing Caltrain Bayshore Station (possibly supplemented by the "temporary private shuttles" proposed on page S-7). In addition, the 29 Muni bus line, for example, could be rerouted to serve that portion of Third Street between Gilman Avenue and Bayshore Boulevard which would otherwise no longer be served. 11-19

An extension of Geneva Avenue proposed by the City of Brisbane is being designed to include light rail for future continuation directly to the Balboa Park BART station. A multimodal transit facility with a larger site and better access than included at the proposed southern terminus would be provided where this alternative route crosses the Caltrain tracks, just south of the current Bayshore Station. Such a facility would mitigate the "higher traffic volumes along Bayshore Boulevard than assumed in this EIS/EIR" (Footnote 26 on page 3-46) anticipated from development of the surrounding area in Brisbane. 11-20

Instead of addressing this alternative route, the Draft EIS/EIR defers its analysis until the "need for possible future planning of a branch line of Third Street light rail is established" (page S-7), because this alternative "would need subsequent conceptual engineering and environmental analysis if proposed at a future date" (page S-4). Yet, the Candlestick Point alternative had been proposed earlier, in the 1993 Bayshore Transit Study, and it appears to be needed according to the recent transit impact analysis conducted as part of the Candlestick Point Stadium and Retail/Entertainment Center EIR (page 3-33). If a final determination may not be possible until that EIR is complete (Footnote 24 on page 3-37, Footnote 11-21

26 on page 3-46), then it may be premature certify the Third Street Light Rail EIR.

An analysis of this "environmentally superior alternative" (page 6-4) is necessary to adequately evaluate the proposed Third Street Light Rail in terms of the project goals and objectives stated on pages S-2 and S-3, particularly:

3. Economic Revitalization/Development Goal. Design transportation improvements that support economic revitalization and development initiatives within the Corridor.
5. Environmental Goal. Provide transit improvements that enhance and preserve the social and physical environment and minimize potential negative impacts during construction and operation of the line.
6. Financial Goal. Implement transit improvements that provide for the efficient use of limited financial resources.
7. Community Acceptance and Political Support Goad. Provide a transportation system that reflects the needs and desires of Corridor residents and business people and is compatible with the City's planning initiatives.

11-22

In addition, we suggest the following specific corrections/clarifications:

Page S-16	How does Table S-5 conclude that the Bayshore/Arleta intersection will be mitigated to LOS D or better, as required by City policy (page 3-15), when Footnote 26 (page 3-46) states that the traffic projections do not take into their accounting of cumulative development that anticipated just over the City limits in Brisbane?	11-23
Page S-21	See comments for page S-16.	
Page 2-21	The description of the light rail alignment shifting to the east side of the Bayshore Boulevard right-of-way south of the Highway 101 overcrossing is inconsistent with page 2-58 (Figure 2-8) and page 2-45 (second bullet).	11-24
Page 2-45	The southeast corner of Bayshore Boulevard and Sunnydale Avenue is not vacant; it is developed with a car wash facility (page 2-21).	11-25

Page 3-38	Table 3-9 should include in its comments that the southbound Bayshore Boulevard left turn to Hester Avenue will operate at LOS F as stated on page 3-42.	11-26
Pages 4-55 & 4-56	The topographical information is not meaningful unless the elevations described in the text and Table 4-10 are translated into existing percent grades for appropriate sections of the proposed alignment, particularly in comparison to the 7% maximum grade acceptable for light rail (page 2-21).	11-27
Pages 5-41 & 5-42	Section 5.7.3, Energy Considerations, fails to quantify the greater energy consumption required for the light rail to operate on steeper grades. Thus, it also does not identify potential mitigation measures, such as alternate routes with less steep grades.	11-28

Thank you again for this opportunity to comment on the Draft Environmental Impact Statement/Report.

Sincerely,

Robin Leiter

Robin Leiter
City Manager

cc: Brian J. Kalahar, Planning Department, City and County of San Francisco, 1660 Mission Street, San Francisco, CA 94103-2414
Carmen Clark, San Francisco Transportation Authority, 100 Van Ness Avenue, 25th Floor, San Francisco, CA 94102
Geoffrey Kline, CCAG CMP Program Manager, City/County Association of Governments of San Mateo County, 10 Twin Dolphin Drive, Suite C-200, Redwood City, CA 94065-1036

Comment Letter 11

Robin Leiter, City Manager
City of Brisbane
50 Park Lane
Brisbane, CA 94005

Response 11-1

The public comment period ended on May 19, 1998. There has been extensive opportunities for public input on alternatives and the environmental review process since the Systems Planning Study began in 1991, including numerous Technical Advisory Committee (TAC), Community Advisory Group (CAG), and neighborhood meetings. The City is grateful for Brisbane's statement of support and cooperation.

Response 11-2

While the implementation of light rail would reduce the traffic capacity of Third Street and Bayshore Boulevard, most, but not all, of Third Street's and Bayshore Boulevard's signalized intersections would continue to function acceptably with the removal of one traffic lane in each direction, as discussed on page 3-41 of the DEIS/DEIR. Implementation of light rail would result in unacceptable traffic operations at the Third Street/Evans Street intersection, which would be mitigated to less-than-significant conditions (see page 3-46 of the DEIS/DEIR). On June 23, 1998, the PTC selected the Fourth Street bridge and the mixed-flow options as part of the Locally Preferred Alternative. As a result, traffic-related impacts resulting from the Third and Fourth Street bridge option and the single lane options along the Third Street Commercial Lane would not occur. Other intersections expected to operate unacceptably with or without the Project by 2015 are: Third Street/Cesar Chavez Street, Third Street/King Street, and Fourth Street/King Street.

In response to comments and concerns, modifications along Bayshore Boulevard have been developed to improve traffic capacity at the Bayshore/Arleta-Blanken intersection and at the Highway 101 overcrossing. These modifications, which include minor realignments and circulation revisions, are described further under "Staff Initiated Changes". They would not result in new significant impacts or obviate the need for mitigation at the other locations.

Response 11-3

The construction impacts for the three-block long segment involving the construction of a retained cut section on Third Street between Jamestown and Meade Avenues, and the three-block segment involving the construction of a retained fill section on Bayshore Boulevard between Hester and Blanken Avenues would be somewhat greater - i.e., construction impacts of longer duration - than the rest of the project. This is because it would take longer to adjust conflicting underground utility lines, excavate the cut section, form and pour the concrete retaining walls and then backfill and re-pave the adjacent street. These construction impacts would last about 12-15 months. Temporary construction impacts of the magnitude anticipated at this location or other locations along the IOS alignment are not generally considered to be significant. Temporary and intermittent construction activity is a common feature of the urban environment.

As noted in Section E, Staff Initiated Changes, the intersection of Third/Key will remain open to pedestrian cross traffic. A station will be located in the retained cut between Key and LeConte Avenues, allowing the proposed station between Ingerson and Jamestown to be deleted. As a result, the proposed right-of-way acquisitions at the intersection of Third Street and Jamestown will no longer be necessary. See Section E, Staff Initiated Changes.

Response 11-4

The DEIS/DEIR identifies and evaluates credible mitigation measures for potential traffic and transit impacts for Segment 1 of the IOS. However, since issuance of the DEIS/DEIR, the following improved traffic and transit circulation concepts were developed for Segment 1.

As noted in the "Staff Initiated Changes," the proposed light rail alignment and traffic circulation in the area of the Highway 101 overcrossing has been revised (refer to "Staff Initiated Changes" E-3 and revised Figure 2-8). The revision, which would add turning lanes, provide lane delineation, and add new retaining walls, would improve the southbound left-turn movement to LOS D or better conditions during the a.m. and p.m. peak hours in 2015. The revised improvements were deemed feasible in the *US 101 and Third Street Overcrossing Draft Project Study Report/Project Report* (April 1998), available for review at the San Francisco Planning Department.

"Staff Initiated Change" E-2 redesigns the Bayshore Boulevard/Arleta-Blanken Avenues intersection to accommodate a center high-platform between Arleta and a re-aligned Blanken (Blanken would be reconfigured to intersect Bayshore at a 90-degree angle). New coordinated traffic signals would be placed at Bayshore/Blanken and Bayshore/Arleta, and the coordinated system would improve operations to LOS C conditions during both the a.m. and p.m. peak hours in 2015. This modification also retain the current routings of the 9X and 9BX bus lines.

Response 11-5

The 9X/9AX/9BX San Bruno Expresses would provide faster service from Visitacion Valley to Chinatown than the IOS, but they would not provide faster service than the New Central Subway. In addition, the San Bruno Expresses only provide service during weekday peak hours and midday. Table 3-7 (p. 3-31) indicates an in-vehicle travel time between Visitacion Valley (Bayshore and Arleta) and Chinatown (Stockton and Clay) of 30 minutes on the New Central Subway. The 9X travel time (not shown) would be 35 minutes, while the time on the 15-Third bus would be 49 minutes. It should also be noted that the New Central Subway would achieve the faster travel time, while also offering access and transfer opportunities at 16 intermediate stations in Bayview Hunters Point, the Central Waterfront and Mission Bay. The 9X, on the other hand, operates on the freeway (subject to unpredictable traffic conditions) and does not stop north of Visitacion Valley until Sixth and Bryant Streets.

Response 11-6

Section 6.5 of the DEIS/DEIR describes an Environmentally Superior Alternative among the alternatives analyzed in the document. Any consideration of an alignment beyond the County line was precluded by the San Francisco County Transportation Authority (File #PPC110491) in December 1991. Alignments to Candlestick Point or along Geneva Avenue were not included in the alternatives described in the *Bayshore Transit Study,* in part, because they would not serve the transportation needs of the Bayview Hunters Point and Visitacion Valley communities. The environmentally superior alternative described in the DEIS/DEIR would not result in any project-specific significant environmental impacts that could not be avoided with mitigation measures described in the DEIS/DEIR.

Response 11-7

The Bayshore Station was proposed as the terminus of the Third Street light rail line on the basis of previous studies and decisions. In 1991, the San Francisco County Transportation Authority approved File #PPC110491 that prohibited MUNI from extending service beyond the County line.

A Gilman/Candlestick route option that would have provided service to Candlestick Point and Executive Park was presented by Tuntex during the Systems Planning Phase at community meetings. Both Visitacion Valley and Bayview community representatives objected to this route because it would not serve their communities' needs. This route option would cut off service to a part of the Bayview community and would require the 15 bus to continue service. In 1994, the Public Transportation Commission fixed the southern terminus of the Third Street light rail line at the Caltrain Bayshore Station, although the northern terminals were not designated at that time. On July 8, 1997, the PTC defined the alternatives and design options that would be carried forward for environmental review in the DEIS/DEIR (refer to page 2-6).

The DEIS/DEIR discusses possible future branches of the light rail line, which could include extensions to serve development in Brisbane or at Candlestick Point. These extensions would not be precluded by the proposed IOS alignment and terminus, although funding has not been identified for any future extensions. This EIS/EIR addresses a locally funded project that would terminate at the County line and meet the needs of Visitacion Valley, Bayview Hunters Point, and Mission Bay.

Response 11-8

No significant construction impacts or significant project-specific impacts associated with light rail operation have been identified (see Responses 11-3, 11-4, 11-9 and 11-10 for Segments 1 and 2 south of Gilman Avenue).

Response 11-9

Construction of the light rail alignment at the Highway 101 overcrossing will take at least one year to complete. Construction of the alignment in other segments that are confined to street right-of-way could take a minimum of two weeks (and possibly more) per side of street per block (sixth paragraph of page 2-59). The additional construction time required for the Highway 101 overcrossing segment is due to the installation of retaining walls and new ramps, as well as retained cut and fill sections.

The DEIS/DEIR indicates on page 3-40 that construction would occur first on one side of the street than the other to minimize traffic disruption. In addition, the DEIS/DEIR states at the top of page 3-51 that "As discussed previously, travel speeds for both automobiles and trucks would be slightly (emphasis added) slower along Bayshore Boulevard and Third Street during construction of each of the three segments of the IOS. During construction of the IOS, the parking lanes along Bayshore Boulevard would at times be converted into traffic lanes to enable two travel lanes in each direction. This would prohibit the use of curb lanes for parking of trucks to load and unload goods. Trucks would be required to park on nearby local side streets, or elsewhere outside the construction zone." Temporary construction impacts of the magnitude anticipated at this location or other locations along the IOS alignment are not generally considered significant. Temporary and intermittent construction activity is a common feature of the urban environment.

On page 3-32, the DEIS/DEIR states, that reducing the number of lanes along Bayshore Boulevard and Third Street from three to two through lanes in each direction would only marginally affect intersection performance and increase Corridor travel times, that is, unless the second lane is frequently blocked by buses stopping at bus stops.

The DEIS/DEIR states in the fifth paragraph on page 3-33 that "....the retained cut section between Meade and Jamestown Avenues would prohibit inclusion of a station within this area." This station has been relocated between LeConte and Key Avenues.

In the middle of page 3-41, the DEIS/DEIR states that "The DPT (City's Department of Parking and Traffic) determined that all new signalized intersections would perform at LOS C or better conditions in 2015 during both the a.m. and p.m. peak periods.....Generally, it was determined that most, but not all, of Bayshore Boulevard's and Third Street's intersections would continue to function acceptably with the removal of one traffic lane in each direction. .. Thus removal of the inside lanes and installation of exclusive left-turn lanes at major intersections would continue to enable acceptable traffic flow at most of the study intersections."

Since issuance of the DEIS/DEIR, improved traffic and transit circulation concepts were developed for Segments 1 and 2 to reduce potential impacts after construction. These include intersection improvements at Bayshore Boulevard/Arleta-Blanken Avenues, improvements on and near the Highway 101 overcrossing, and changes on Third Street at Le Conte Avenue, Keith Street, and Key Avenue (refer to "Staff Initiated Changes" E-2, E-3, and E-4 and Responses 11-4, 11-13, 11-14, and 11-15). It should be noted that the Light Rail Alternative would not cause any traffic related impacts in Segments 1 and 2 that cannot be mitigated to a less-than-significant level. Since the Light Rail Alternative would reduce the traffic-carrying capacity of Bayshore Boulevard and Third Street in comparison to the No Project and No Build/TSM Alternatives decision-makers will weigh this cumulative effect against the Light Rail Alternative's potential benefits.

Response 11-10

As noted in the "Staff Initiated Changes," the Bayshore Boulevard/Arleta-Blanken Avenues intersection is proposed to be modified to accommodate a center high-platform between Arleta and a re-aligned Blanken. Blanken would be reconfigured from it's skewed alignment to intersect Bayshore at a 90-degree angle. Although the redesign of this intersection is currently being studied, no new significant impacts are anticipated. New coordinated traffic signals would be placed at Bayshore/Blanken and Bayshore/Arleta, and the coordinated system would improve operations to LOS C conditions during both the a.m. and p.m. peak hours in 2015 (Department of Parking and Traffic Memorandum, Jack Fleck and Andre Chandra, July 9, 1998 available for review at the San Francisco Planning Department). This modification also retains the current routings of the 9X and 9BX bus lines. Refer to E-2, "Staff Initiated Changes".

Table 3-9 on page 3-38, the third row is revised.

TABLE 3-9

INTERSECTIONS EXPECTED TO OPERATE AT LOS D, E, OR F CONDITIONS 2015 UNMITIGATED CONDITIONS

(Revised July 24, 1998)

	A.M. PEAK HOUR		P.M. PEAK HOUR		
INTERSECTION	NO PROJECT & NO BUILD/ TSM	LRT	NO PROJECT & NO BUILD/ TSM	LRT	COMMENTS
Bayshore/Arleta-Blanken	~~D~~ C	~~F~~ C	~~E~~ C	~~E~~ C	

Table 3-10 on page 3-39 has been revised to reflect the higher vehicular speeds that would occur as a result of the above improvements to the Bayshore/Arleta-Blanken intersection re-alignment (for the Light Rail Alternative only). All peak hour travel speeds would be between 15 and 19 mile per hour, resulting in acceptable LOS C conditions.

TABLE 3-10

TRAFFIC TRAVEL SPEED COMPARISON

(Revised July 24, 1998)

		AVERAGE SPEED (mph) / LOS					
ROUTE	PEAK PERIOD	EXISTING	2015 NO PROJECT & NO BLD/TSM	LIGHT RAIL OPTION 1 (2 LANES)	LIGHT RAIL OPTION 2 (1 LANE)	LIGHT RAIL OPTION 3 (1 LANE HYBRID)	LIGHT RAIL OPTION 4 (MIXED FLOW)
Bayshore Boulevard:							
Sunnydale to Hester	A.M.	21 / B	16 / C	**15 / C**	**15 / C**	**15 / C**	**15 / C**
	P.M.	18 / C	10 / D	**18 / C**	**18 / C**	**18 /C**	**18 / C**
Hester to Sunnydale	A.M.	24 / B	18 / C	**19 / C**	**19 / C**	**19 / C**	**19 / C**
	P.M.	23 / B	15 / C	**17 / C**	**17 / C**	**17 / C**	**17 / C**
Third Street:							
Jamestown to 16th	A.M.	28 / A	22 / B	16 / C	**< 5 / F**	**< 5 / F**	15 / C
	P.M.	23 / B	22 / B	16 / C	**< 5 / F**	**< 5 / F**	15 / C
16th to Jamestown	A.M.	25 / A	22 / B	10 / D	**< 5 / F**	**< 5 / F**	10 / D
	P.M.	24 / B	18 / C	9 / D	**< 5 / F**	**< 5 / F**	9 / D

Source: City and County of San Francisco, Department of Parking and Traffic, **July 1998**

On page 3-39 the third to last bullet point is deleted.

- ~~In Segment 1, Bayshore Boulevard/Arleta-Blanken Avenue would degrade to LOS E during the p.m. peak hour;~~

On page 3-42 the last paragraph is revised.

> All of the intersections would perform at LOS D or better. ~~except the Bayshore Boulevard/Arleta-Blanken Avenue intersection. Due to traffic diverting from Tunnel Avenue, this intersection would degrade from LOS D (under cumulative No Project and No Build/TSM Alternative) to LOS F conditions during the a.m. peak hour. It would operate at LOS E during the p.m. peak hour for all alternatives~~. It should be noted…

On page 3-43 the first paragraph is revised.

> ~~Due to the reduced number of through lanes, traffic re-routing and deteriorated condition at the Arleta Blanken Avenue intersection, the travel speeds on Bayshore Boulevard would decrease. Average northbound travel speeds would be 10 miles per hour (mph) (LOS D) during the a.m. peak hour and 7 mph (LOS E) during the p.m. peak hour. In the southbound direction, average travel speeds would be 16 mph (LOS C) during the a.m. peak hour and 15 mph (LOS C) during the p.m. peak hour.~~ **As a result of the proposed improvements at the Arleta-Blanken Avenues intersection, peak hour travel speeds Bayshore Boulevard would be between 15 and 19 mile per hour, resulting in acceptable LOS C conditions.**

On page 3-46 the first bullet is deleted.

> - ~~Bayshore Boulevard/Arleta Blanken Avenues. By 2015, this intersection's performance would degrade to LOS F due to the addition of a traffic signal phase serving a new southbound left-turn lane (into Blanken Avenue), which would be needed to accommodate turns diverted from the elimination of the left-turn lane to Tunnel Avenue. Eventually, left-turns from eastbound Arleta Avenue to northbound Bayshore Boulevard should be prohibited, thereby eliminating the existing signal phase serving Arleta. In the future, this would improve the intersection to LOS D conditions, but would require re-routing MUNI's 9X and 9BX lines along a parallel alternative route. It is recommended that, when necessary, a break in Bayshore Boulevard's median at Raymond Avenue be created to allow eastbound-to-northbound left-turns from Raymond Avenue instead of Arleta Avenue. This would require traffic, including MUNI buses, to re-route along a two-block stretch of Raymond Avenue.~~[26]

Note that the associated footnote was also removed. Revisions also were made in the Executive Summary to reflect the above changes.

On page S-13 the first paragraph is revised.

> By 2015, due to increased background traffic levels, ~~eight~~ **seven** intersections in the Corridor will be operating at congested conditions (LOS E or F) during weekday peak periods. Therefore, the impacts to the intersections would be considered cumulative unavoidable adverse impacts. ~~Two~~ **One** of intersections (Fourth/Brannan) …

Table S-5 on page S-15 is revised.

On page 3-48 Table 3-12 is revised to reflect the higher vehicular speeds that would occur as a result of the above improvements to the Bayshore/Arleta-Blanken intersection re-alignment (for the

TABLE S-5 (Cont.)

SUMMARY OF MAJOR TRANSPORTATION-RELATED ENVIRONMENTAL IMPACTS FOR THE NO PROJECT, NO BUILD/TSM, AND LIGHT RAIL ALTERNATIVES

(Revised July 24, 1998)

Transportation Area	Light Rail Alternative—Initial Operating Segment	Light Rail Alternative—New Central Subway	No Project Alternative	No Build/TSM Alternative
Traffic	Implementation of light rail would contribute to the LOS E and F conditions expected at **three** intersections also significantly impacted by the No Project Alternative under cumulative conditions: Third/Cesar Chavez, Third/King; and Fourth/King. In addition, ~~two~~ one other intersections would be significantly affected by the IOS: Third/Evans. ~~and Third/Berry (for Mission Bay Option 2 only).~~ *With mitigation (e.g., lane striping, parking removal, and/or other measures), impacts would be less than significant for the above intersections, except Third/Cesar Chavez, Third/King and Fourth/King, which could not be feasibly mitigated (cumulative unavoidable adverse impacts).* Additionally, the one-lane design options in the Third Street commercial core would result in LOS F conditions (a significant impact) at all intersections throughout the commercial core, resulting in extreme congestion and traffic diversion. *This impact cannot be mitigated feasibly.*	Implementation of the New Central Subway would contribute to LOS E and F conditions expected at four intersections also significantly impacted by the No Project Alternative under cumulative conditions: Third/Townsend, Third/Brannan, Fourth/Brannan, and Fourth/Bryant. In addition, under the New Central Subway, the Third/Bryant intersection would degrade to LOS F. *With mitigation (e.g., lane striping, parking removal, and/or other measures), impacts would be less than significant at Third/Bryant and Fourth/Brannan, but the other three intersections could not be feasibly mitigated (cumulative unavoidable significant impacts).*	Level of Service E or F conditions would exist at eight intersections under cumulative conditions: Bayshore at Arleta; Third at Cesar Chavez, King, Townsend, and Brannan; and Fourth at King, Brannan, and Bryant. *With mitigation (e.g., lane striping, parking removal, and/or other measures), impacts at Bayshore/Arleta and Fourth/Brannan would be less than significant.* The remaining six intersections could not be reasonably mitigated, and therefore the impacts are considered cumulative unavoidable adverse impacts.	Level of Service E or F conditions would exist at eight intersections under cumulative conditions: Bayshore at Arleta; Third at Cesar Chavez, King, Townsend, and Brannan; and Fourth at King, Brannan, and Bryant. *With mitigation (e.g., lane striping, parking removal, and/or other measures), impacts at Bayshore/Arleta and Fourth/Brannan would be less than significant.* The remaining six intersections could not be reasonably mitigated, and therefore the impacts are considered cumulative unavoidable adverse impacts.

TABLE 3-12

MITIGATED CONDITIONS TRAVEL SPEED COMPARISON
(Revised July 24, 1998)

ROUTE	PEAK PERIOD	AVERAGE SPEED (mph)/LOS			
		LIGHT RAIL OPTION 1 (Two Lanes)		LIGHT RAIL OPTION 4 (Mixed Flow)	
		Unmitigated	Mitigated	Unmitigated	Mitigated
Bayshore Boulevard:					
Sunnydale to Hester	A.M.	~~10/D~~ **15 / C**	~~13/C~~ **No mitigation**	Same as Option 1	
	P.M.	~~7/E~~ **18 / C**	~~9/D~~ **No mitigation**	Same as Option 1	
Hester to Sunnydale	A.M.	~~16/C~~ **19 / C**	~~17/C~~ **No mitigation**	Same as Option 1	
	P.M.	~~15/C~~ **17 / C**	~~16/C~~ **No mitigation**	Same as Option 1	
Third Street:					
Jamestown to 16th	A.M.	16/C	17/C	15/C	16/C
	P.M.	16/C	18/C	15/C	17/C
16th to Jamestown	A.M.	10/D	16/C	10/D	15/C
	P.M.	9/D	16/C	9/D	15/C

Source: City and County of San Francisco, Department of Parking and Traffic, ~~December 1997.~~ **July 1998**

Light Rail Alternative only). All peak hour travel speeds would be between 15 and 19 mile per hour, resulting in acceptable LOS C conditions along Bayshore Boulevard.

Response 11-11

See Response 11-10

Response 11-12

See Response 11-10

Response 11-13

As noted in the "Staff Initiated Changes," the proposed light rail alignment and traffic circulation in the area of the Highway 101 overcrossing has been revised (refer to E-3 "Staff Initiated Changes" and revised Figure 2-8). The revision, which would add turning lanes, provide lane delineation, and add new retaining walls, would improve the southbound left-turn movement to LOS D or better conditions during the a.m. and p.m. peak hours in 2015. The revised improvements were deemed feasible in the *US 101 and Third Street Overcrossing Draft Project Study Report/Project Report* (April 1998), available for review at the San Francisco Planning Department.

Response 11-14

See Response 11-13. The modified intersection geometry, deemed feasible in the *US 101 and Third Street Overcrossing Draft Project Study Report/Project Report* (April 1998), would provide four southbound approach lanes. The first, or inside, lane would serve left-turn movements to northbound Bayshore Boulevard and US 101 only. The next lane would serve left-turn movements to northbound Third Street and straight-through movements to Hester Avenue. The third and fourth lanes would serve right-turn movements to southbound Bayshore Boulevard. These improvements would result in LOS D or better conditions for the southbound approach during the a.m. and p.m. peak hours in 2015.

Response 11-15

The DEIS/DEIR identifies and evaluates credible mitigation measures for potential traffic and transit impacts for Segments 1 and 2 of the IOS. However, since issuance of the DEIS/DEIR, improved traffic and transit circulation concepts were developed for portions of each of these segments. The "Staff Initiated Changes" for Segment 1 are described in Response 11-4. The following improvements are proposed for Segment 2.

As noted in the "Staff Initiated Changes," after passing northerly over Highway 101, the revised light rail alignment would descend onto Third Street in a retained cut which would reduce the steep nine percent grade to five to eight percent (refer to E-3 and E-4 of "Staff Initiated Changes" and revised Figure 2-8). The retained cut would be placed in the middle of Third Street 1.5 to 2.0 meters (6 to 8 feet) below street level and extend for 275 meters (900 feet) eliminating left turn movements between Third Street and Le Conte Avenue, Keith Street, and Key Avenue. Access to Third Street for residents living along Le Conte, Keith, and Key west of Third would be replaced by extending Keith northeast along the existing Caltrans right-of-way to the intersection of Third/Jamestown. The proposed station location at Jamestown would be changed to Third between Le Conte and Key.

Relocation of the Jamestown station would reduce the need for a shuttle bus linking the Meade/LeConte Avenues neighborhood area with the proposed station. However, it is still recommended that MUNI run a shuttle bus route to assist patrons in accessing the light rail line and monitor its use to determine its long-term applicability.

Response 11-16

Refer to Response 11-5.

Response 11-17

Comment noted. The IOS results in a net increase in Corridor ridership of 2,450 per day. However, it is correct that during operation of the IOS, some patrons who formerly used the 15-line will switch to the 9X. Many of these riders will switch back to the light rail line when the New Central Subway is operational. The Third Street Light Rail Project, which is evaluated in this DEIS/DEIR is the complete two-phase project, including the New Central Subway. The Initial Operating Segment, is, as the name implies, an initial segment which does not offer the full benefits of the complete project.

Response 11-18

As indicated in E-1 of "Staff Initiated Changes," an alternate site plan that would replace the parking structure with a smaller, surface parking area is also being considered for the Caltrain

Bayshore Station area. The smaller, surface parking area would obviate the need to relocate the UPRR spur track. In either case, three business relocations and five private parcel acquisitions would occur under the Uniform Relocation Act. These station area plans would not preclude future light rail extensions as discussed in Response 11-7.

Response 11-19

Refer to Response 11-7. A Gilman/Candlestick route option that would have provided service to Candlestick Point and Executive Park was presented by Tuntex during the Systems Planning Phase. Both Visitacion Valley and Bayview community representatives objected to this route because it would not serve their communities' needs.

Response 11-20

Refer to Response 11-7. The IOS would be constructed with local funds beginning in 2000. Brisbane's proposal for a new Highway 101 interchange, intermodel station, Geneva Avenue extension, and light rail extension lack funding and are not expected to be funded in time for construction of the IOS. Nonetheless, a light rail extension along Geneva Avenue to the Balboa Park BART Station would not be precluded with the proposed Bayshore Station design, if Brisbane were to develop such a project.

Response 11-21

Refer to Responses 11-7, 11-19, and 11-20.

Response 11-22

The goals and objectives described in the DEIS/DEIR pertain to economic revitalization, preservation of the environment, and community support within the Corridor. These goals would be met by the Light Rail Alternative, which is identified as the Environmentally Superior Alternative

Response 11-23

See Response 11-10

Response 11-24

As indicated on page 2-21 in the DEIS/DEIR, approaching the Highway 101 overcrossing from the south, the light rail alignment would shift to the east in the Bayshore Boulevard right-of-way. The shift would allow northbound vehicles to be segregated into Third Street-bound traffic and Highway 101/Bayshore-bound traffic. This description is consistent with Figure 2-8 and the second bullet at the bottom of page 2-45.

Response 11-25

Although the exact location for the substation in the vicinity of the southeast corner of Bayshore/Sunnydale has not been determined, the comment is correct that a car wash currently exists on this corner. The bullet point in the first paragraph of page 2-45 is revised.

- Southeast corner of Bayshore/Sunnydale **(in the area of the existing car wash)**

Response 11-26

Table 3-9 reports overall intersection service levels, not service levels for individual traffic movements. As noted, page 3-42 states that the southbound left-turn movement from Bayshore Boulevard to Hester Avenue would function at LOS F if only one left-turn lane was provided. However, two left-turns are being proposed as part of the "Staff Initiated Changes" to enable an acceptable level of service for this movement.

Response 11-27

On page 2-21, paragraph 3, the DEIS/DEIR states that the maximum gradient along Bayshore Boulevard is nine percent (just south of the Highway 101 overcrossing). To reduce the gradient to seven percent, a retained fill section 215 meters long would be constructed. Similarly, on page 2-21, paragraph 5, the text indicates that a retained cut would be constructed on Third Street immediately north of the Highway 101 overcrossing to reduce the gradient from nine to seven percent. These segments represent the only locations along the IOS alignment that have gradients greater than seven percent.

Response 11-28

On page 5-41, Table 5-4 presents energy consumption calculations for the Light Rail Alternative options. The calculations were done according to the requisite FTA formula that does not differentiate between sizes of vehicles, such as the energy consumption of standard versus articulated diesel buses. Since current Third Street service is largely operated with articulated diesel buses, the comparisons presented in this table are approximate and represent regional energy consumption differences in BTUs per year. At this gross scale, annualized vehicle miles are multiplied by a specific energy consumption factor for each mode to ascertain significant energy consumption differences. As stated on page 5-42, the Light Rail Alternative requires no additional Hetch Hetchy generating or transmission capacity. Therefore, according to FTA guidelines, converting the 15-Third bus line to light rail would not represent a significant energy impact to meet power demands.

Under the FTA formula, vehicle miles traveled is the determining variable in the equation. Consequently, operating light rail over a more circuitous route would increase the BTUs required for the Light Rail Alternative. The gradient of an alignment would make no appreciable difference in this calculation.

State of California
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

PETE WILSON
GOVERNOR

PAUL F MINER
DIRECTOR

Informational

May 18, 1998

BRYAN KALAHAR
SAN FRANCISCO PLANNING DEPT.
1660 MISSION STREET
SAN FRANCISCO, CA 94602

Subject: THIRD STREET LIGHT RAIL PROJECT, 96.281E SCH #: 96102097

Dear BRYAN KALAHAR:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call Kristen Derscheid at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Notice of Completion

Appendix F

See NOTE below
SCH # 96102097

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 916/445-0613

Project Title: THIRD STREET LIGHT RAIL PROJECT
Lead Agency: SAN FRANCISCO PLANNING DEPT.
Contact Person: BRYAN F. ALABBIL
Street Address: 1660 MISSION ST.
Phone: (415) 558-6359
City: SAN FRANCISCO
Zip: 94103
County: SAN FRANCISCO

Project Location

County: SAN FRANCISCO
City/Nearest Community: SAN FRANCISCO
Cross Streets: THIRD ST / BAYSHORE BLVD.
Total Acres: n/a
Assessor's Parcel No. N/A
Section: ____ Twp. ____ Range: ____ Base: ____
Within 2 Miles: State Hwy #: 101 & 280
Waterways: SF BAY
Airports: SFO
Railways: CALTRAIN
Schools: ____

Document Type

CEQA:
☐ NOP
☐ Early Cons
☐ Neg Dec
☒ Draft EIR
☐ Supplement/Subsequent
☐ EIR (Prior SCH No.) ____
☐ Other ____

NEPA:
☐ NOI
☐ EA
☒ Draft EIS
☐ FONSI

Other:
☒ Joint Document
☐ Final Document
☐ Other ____

FILED
APR 9 1998
STATE CLEARINGHOUSE

Local Action Type

☐ General Plan Update
☐ General Plan Amendment
☐ General Plan Element
☐ Community Plan
☐ Specific Plan
☐ Master Plan
☐ Planned Unit Development
☐ Site Plan
☐ Rezone
☐ Prezone
☐ Use Permit
☐ Land Division (Subdivision, Parcel Map, Tract Map, etc.)
☐ Annexation
☐ Redevelopment
☐ Coastal Permit
☒ Other THIRD ST EXTENSION

Development Type

☐ Residential: Units ____ Acres ____
☐ Office: Sq.ft. ____ Acres ____ Employees ____
☐ Commercial: Sq.ft. ____ Acres ____ Employees ____
☐ Industrial: Sq.ft. ____ Acres ____ Employees ____
☐ Educational ____
☐ Recreational ____
☐ Water Facilities: Type ____ MGD ____
☒ Transportation: Type LIGHT RAIL EXTENSION
☐ Mining: Mineral ____
☐ Power: Type ____ Watts ____
☐ Waste Treatment: Type ____
☐ Hazardous Waste: Type ____
☐ Other: ____

Project Issues Discussed in Document

☒ Aesthetic/Visual
☐ Agricultural Land
☒ Air Quality
☒ Archeological/Historical
☒ Coastal Zone
☒ Drainage/Absorption
☒ Economic/Jobs
☒ Fiscal
☐ Flood Plain/Flooding
☐ Forest Land/Fire Hazard
☒ Geologic/Seismic
☐ Minerals
☒ Noise
☒ Population/Housing Balance
☒ Public Services/Facilities
☒ Recreation/Parks
☐ Schools/Universities
☐ Septic Systems
☒ Sewer Capacity
☒ Soil Erosion/Compaction/Grading
☐ Solid Waste
☒ Toxic/Hazardous
☒ Traffic/Circulation
☒ Vegetation
☒ Water Quality
☒ Water Supply/Groundwater
☐ Wetland/Riparian
☒ Wildlife
☒ Growth Inducing
☒ Landuse
☒ Cumulative Effects
☐ Other ____

Present Land Use/Zoning/General Plan Use

PUBLIC STREETS

Project Description

The proposed project would extend MUNI light rail service via Third Street and Bayshore Blvd. to the southeastern portion of San Francisco. Later phases would extend service underground into Chinatown. Alternatives are considered.

NOTE: [illegible]

Attachment

State Clearinghouse Contact: Mr. Chris Belsky
(916) 445-0613

State Review Began: 4.3.98
Dept. Review to Agency 5.11
Agency Rev to SCH 5.15
SCH COMPLIANCE 5.18

Please note SCH Number on all Comments
96102097
Please forward late comments directly to the Lead Agency

AQMD/APCD 2 (Resources: 4/4)

Project Sent to the following State Agencies

X Resources
X Boating
___ Coastal Comm
___ Coastal Consv
___ Colorado Rvr Bd
___ Conservation
X Fish & Game # 3
___ Delta Protection
___ Forestry
X Parks & Rec (OHP)
___ Reclamation
X BCDC
___ DWR
___ OES
Bus Transp Hous
___ Aeronautics
___ CHP
X Caltrans # 4
___ Trans Planning
___ Housing & Devel
Health & Welfare
___ Drinking H2O

State/Consumer Svcs
___ General Services
Cal/EPA
___ ARB
___ CA Waste Mgmt Bd
___ SWRCB: Grants
___ SWRCB: Delta
___ SWRCB: Wtr Quality
___ SWRCB: Wtr Rights
X Reg. WQCB # 2
___ DTSC/CTC
Yth/Adlt Corrections
___ Corrections
Independent Comm
___ Energy Comm
X NAHC
X PUC
___ Santa Mn Mtns
X State Lands Comm
___ Tahoe Rgl Plan

B. Special Interest Groups

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ATTORNEYS AT LAW
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#12

May 19, 1998

Hilary E. Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, California 94103

Re: Third Street Light Rail Draft EIS/EIR

Dear Ms. Gitelman:

We write to provide you with 49ers Stadium Associates' response to the April 3, 1998 draft EIS/EIR (the "Report") for the light rail project contemplated for Third Street in San Francisco.

Our principal concern is that the Report fails to address or consider any alternatives to the contemplated Third Street route. As you are aware, an analysis of alternatives is an important component of any EIS/EIR. This process ensures that all viable options have been investigated and that the alternative with the combined maximum benefit for and least negative impact on the surrounding environment has been identified. We do not believe the draft Report supplies sufficient information for such an informed choice, as it does not consider the alternatives sufficiently. We note that prior public transit studies have been conducted in the area, most notably Muni's Bayshore Transit Study conducted in 1993. The route identified in that report warrants investigation, and comparison with the Third Street route. 12·1

49ers Stadium Associates does not believe that the Third Street route, which is a "dead end" line, provides the best service to 3COM Park, or the contemplated new stadium and mall complex, nor does it adequately serve any of the other existing or potential developments in and around the stadium site and to the south. 12·2

We would propose that all viable alternatives be considered at this juncture so as to avoid an investment in a route that may prove inferior.

Regards,

Steven Kay

debart\corresp\gitelman.1

B. SPECIAL INTEREST GROUPS

Comment Letter 12

Steven Kay
Kay & Merkle
100 The Embarcadero, Penthouse
San Francisco, CA 94105-1217

Response 12-1

Responses 11-6, 11-7, and 11-19 indicate the reasons for maintaining the light rail alignment through Bayview Hunters Point and Visitacion Valley within the limits of the City and County of San Francisco. For the purposes of CEQA, a No Project Alternative was included in the DEIS/DEIR as well as an FTA-required No Build/TSM Alternative that expanded existing bus service to meet 2015 demand. These less costly alternatives were compared with the Light Rail Alternative to determine which best conformed with Project goals and was the environmentally superior alternative.

Response 12-2

Comment noted. The Third Street Light Rail Project would provide an essential trunk line to the vicinity of Candlestick Point. A spur line or extension could be added to the trunk line, when a stadium-mall project warrants. (See Response 13-8.)

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#13

May 18, 1998

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VIA HAND DELIVERY

Hilary E. Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103-2414

Re: Third Street Light Rail Draft EIS/EIR
96.281E, State Clearinghouse No. 96102027

Dear Ms. Gitelman:

This letter comments, on behalf of Universal Paragon Corporation, on the April 3, 1998 draft EIS/EIR for the Third Street Light Rail Project.

Our main concern is that the draft does not analyze a reasonable range of alternatives. In fact, the draft does not analyze any alternative light rail route. Not only does alternative routing seem potentially feasible, there are identified alternative routes which appear from available information to be environmentally superior. 13-1

As owners of Executive Park and a large, undeveloped site in Brisbane adjacent to the proposed end of the new line, Universal Paragon's main concern is with the decision to analyze only a route which crosses to the west side of U. S. Highway 101 at the existing Bayshore Boulevard overpass, then dead-ends into a parking lot squeezed between the Caltrain station and existing buildings used by Schlage Lock (the "Dead End Route"). 13-2

The Dead End Route will not serve:

1. Executive Park, whose environmental review covers 1.15 million square feet of office space, 600 residential units, a 350-room hotel and 45,000 square feet of retail space;

2. The proposed Candlestick Point mall, approved by Proposition F for 1.4 million square feet of occupied floor area;
3. The reconstructed Candlestick stadium;
4. Redevelopment at or near the Hunter's Point Shipyard; or
5. Development on Universal Paragon's land adjacent to the San Francisco city limit within the city of Brisbane, for which one million to 4.2 million square feet is allocated under Brisbane's General Plan. 13-2

Because the draft does not analyze an alternative light rail route which would serve these developments, we do not know how many potential light rail riders the Dead End Route would leave unserved, nor do we know what means of transportation those potential riders would use in the absence of light rail. However, we do know that thousands of passengers who would use a light rail system are likely to drive cars instead, if their only light rail choice is the Dead End Route.

The October 17, 1985 Subsequent Environmental Impact Report for Executive Park projected about 20,800 daily trips entering or leaving the site, with about 3,100 during the afternoon peak between 4 p.m. and 6 p.m. (p. 96). While a draft environmental review document has not been published for the Candlestick Point mall, the April 11, 1998 Draft Mission Bay Subsequent Environmental Impact Report analyzed a roughly equivalent aggregate amount of retail space, about 1.5 million square feet (p. III.2) and anticipates generation of almost 150,000 daily trips, of which approximately 8765 would be p.m. peak trips (p.V.E.58). The November 14, 1997 Draft EIS/EIR for the Disposal and Reuse of the Former Naval Shipyard Hunters Point projects 14,900 daily person trips by 2010 and 27,390 by 2025, of which 1490 and approximately 2629 would be p.m. peak trips in the respective years (p. 4-5). For years beyond 2003, Brisbane's General Plan EIR analyzes totals of approximately 300,000 additional average daily trips from development on the Baylands property adjacent to San Francisco (pp. 55-56). It projects 10,461 vehicle trips during a single p.m. peak hour (Traffic and Circulation Technical Memorandum, pp. 9, 78), of which approximately 41% would be to or from San Francisco (Technical Memorandum, pp. 32, 51). Leaving the stadium out of the equation, and recognizing that adding numbers from these different analyses is adding apples to oranges, the rough figures nonetheless suggest a potential to offer light rail service for 300,000 trips per day. If 15 percent of these trips could be switched to light rail, 45,000 trips could be kept off the street network and highways, a major environmental benefit. 13-3

This potential benefit is particularly significant because the Dead End Route, in contrast, does relatively little to reduce traffic impacts. By 2015, the draft EIR projects that the Dead End Route would serve 2,450 more transit passengers than if no light rail were built (Table 3-6, p. 3-30). Compared to this, 45,000 new passengers generated on the southern segment 13-4 would be a major improvement indeed. In fact, the whole line with the Dead End Route is projected in 2015 to serve about 71,00 riders per day over its entire length from the Transbay Terminal to its southern terminus (draft, Table 3-6, p. 3-30). 13-4

An alternative route remaining east of Highway 101 would not directly serve the Visitacion Valley and Little Hollywood neighborhoods, but would provide direct service to additional areas of Bayview-Hunters Point. Again, the draft as published does not evaluate or compare impacts from these two routes. However, a route east of Highway 101 would gain far more new riders than those lost in Visitacion Valley; it might well gain more new riders among Bayview-Hunters Point residents alone. The draft does note that constructing light rail on the Dead End Route would increase ridership of the 9X, 9AX and 9BX bus lines, which connect Visitacion Valley and the Financial District, compared to a scenario with no rail service. (In fact, the projected increase would be larger than the net increase in transit riders resulting from light rail on the Dead End Route). One explanation for this is that light rail on Third Street does not offer an attractive alternative to Visitacion Valley residents headed downtown. The 9 bus lines reach the Financial District (Kearny and Sutter) relatively quickly—in 25 minutes under current conditions (draft, p. 3-7). The Dead End Route would take 31 minutes in 2015 to reach Third and Market. Thus, the number of Visitacion Valley riders served by light rail may well be quite small. Meanwhile, the number of additional Bayview-Hunters Point neighborhood riders from a route farther east seems likely to be larger, given the considerably longer travel times on the 15 bus which now serves Third Street. 13-5

If service to Visitacion Valley does turn out to be critical, another alternative would be for light rail service to cross back under Highway 101 farther south to reach Brisbane, Candlestick and Executive Park. Available information suggests that this would also be feasible. 13-6

Because the draft EIR does not discuss any route east of Highway 101, or any other alternative, we do not know whether those routes would be more or less feasible than the Dead End Route. However, there are several reasons to believe that at least a route farther east would cost less, and also be more feasible for other reasons. First, a route which did not cross over Highway 101 would not have to ascend on 705 feet of retained fill west of the highway and descend for 900 feet on the other side (draft, p. 2-21). Second, not only would cutting and filling likely be more expensive than a more level route, it would also require eliminating stops along inaccessible track sections. Third, the cut and fill would interfere with a number of turns on and off of Bayshore Boulevard (draft, p. 2-21), requiring street and signal modifications. Fourth, the existing overpass would have to be rebuilt for the Dead End Route, and the northbound Highway 101 off-ramp reconstructed (draft, pp. 2-21-2-22). Fifth, the Dead End Route would run down the middle of Bayshore Boulevard, requiring additional street and signal modifications and reducing traffic capacity on a street which probably carries heavier traffic than streets east of Highway 101 such as Gilman or Carroll. Sixth, the Dead End Route would approach the Caltrain station on an alignment which would allow limited space and require acquisition of parking area and potentially a building, both now leased from Universal Paragon for active use by Schlage Lock. 13-7

13-8 Tacitly recognizing the advantages of serving areas which the Dead End Route does not serve, the draft repeatedly mentions (pp. S-4, S-7, 2-6, 2-18) extending service to the east, either by private shuttles, or "branch" lines. The "branches" are, however, relegated to possible future analysis at an unspecified time. The draft notes, possibly as a reason for this summary dismissal, that funding has not been identified for any other route. However, since the Dead End Route is to be financed entirely with locally controlled funds, and the draft does not compare the costs of the disregarded alternatives, this cannot be a reason not to analyze other routes now.

13-9 CEQA prohibits segmented analysis when it is used to break a project into pieces and avoid describing its full consequences. "Piecemealing" has similar defects here, where it will deny the information necessary to make an informed overall choice.

13-10 The choice of the Dead End Route appears to have been motivated in large part by deference to neighborhood concerns. Those concerns are important, but they do not justify omitting environmental analysis of alternatives. Alternatives analysis is critical under the California Environmental Quality Act precisely because it allows decision-makers to make informed policy decisions, based on neighborhood or other concerns, knowing the environmental consequences of their choices. The draft would not allow decision-makers to make an environmentally informed decision.

13-11 Indeed, the only two alternatives it considers are the bare legal minimum—a CEQA-required no project alternative and a NEPA- and Federal Transportation Administration-required no-build/service improvements only alternative. The no project alternative is perfunctory. The service-improvement-only alternative is slightly more useful, but given the strong existing policy commitment to provide physically improved transit service in this corridor the service-only analysis does not reach the critical issue of choosing the most effective physical improvements. Indeed, because the Dead End Route provides relatively limited benefits, the service-only alternative does a disservice, providing a probably misleading understatement of the potential environmental and other benefits from light rail.

13-12 The draft also fails Bayview-Hunters Point, because it does not analyze the ability of light rail serving a Candlestick mall, Executive Park and the redeveloped shipyard to reduce traffic through the neighborhood. Residents who have resisted a light rail line as placing one more burden on Bayview-Hunters Point should have the opportunity to compare the effects of light rail east of Highway 101 to the additional car and bus traffic in their neighborhood which will result if the only light rail line is west of Highway 101.

13-13 Failure to include meaningful alternatives analysis is particularly dramatic because alternative routes have been identified. The Muni's Bayshore Transit Study, for instance, included an alternative along Gilman Avenue east of Highway 101 (Refined Alternative 10). (It would also be possible to minimize effects on residents by following a street farther north, such as Carroll.) This 1993 study also outlined another alternative, crossing back under Highway 101 farther south, in Brisbane, at an existing tunnel, reaching a relocated Caltrain station, Universal Paragon's development site in northernmost Brisbane, then continuing on to Executive Park, and the Candlestick Point area. While the Muni study does not contain enough information to permit an appropriate environmental comparison, it does delineate these apparently feasible alternatives. In discussions with Universal Paragon staff, representatives from the city of Brisbane have appeared eager to cooperate in implementing an alternative along either of these lines. 13.13

We ask that you expand the draft EIS/EIR to consider alternatives now, rather than proceed without environmental analysis to adopt an apparently environmentally inferior choice, putting off into a hypothetical future alternatives which offer immediate, substantial practical benefit.

Sincerely,

RICHARD A. JUDD

RAJ:crs

cc: Bonnie Bamburg, Universal Paragon Corp.

Our File: 655/10

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July 9, 1998

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Re: Third Street Light Rail Draft EIS/EIR, 96.218E

Dear Ms. Gitelman:

On May 18, 1998, I submitted on behalf of Universal Paragon Corporation comments on the April 3, 1998 draft EIS/EIR for the Third Street Light Rail Project. Those comments referred to alternative light rail routes east of Highway 101, either along Gilman or Carroll Avenue or further south, in Brisbane. Based on descriptions given to me by others of Muni's 1993 Bayshore Transit Study, the May 18 letter also said that the 1993 study had identified such alternatives.

Since the deadline for comments I have been able to obtain and review both a September 1993 package of materials and the December 1993 final report from the study. Neither contains significant discussion of the alternatives mentioned in my May 18 letter (though some are mentioned as possible future branch lines). I apologize to you and the Planning and Muni staffs for any time and effort you may have spent or other inconvenience caused by my mistake.

Of course, my client and I continue to believe that alternative routes which would provide service east of Highway 101 should still be analyzed in the Third Street Light Rail Project EIR/EIS.

Sincerely,

RICHARD A. JUDD

cc: Bonnie Bamburg, Universal Paragon Corporation

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Comment Letter 13

Richard A. Judd
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San Francisco, CA 94103-2414

Response 13-1

Refer to Responses 11-6 and 11-7.

Response 13-2

Refer to Response 11-7. Planned development in the Corridor is described in the land use section of the DEIS/DEIR (pages 4-15). This development would include most of the projects identified in the letter. However, Universal Paragon's plans for development in Brisbane were not included because, according to Brisbane City Planner Tim Tune, no application of any kind was before the City of Brisbane for consideration at that time, making actual development a matter of speculation. The Brisbane General Plan, while providing for future development on this site, also calls for lengthy planning and infrastructure development prior to build-out of the sub-area. (Telephone Conversation, August 1997, M. Mednick)

Response 13-3

Comments noted. Refer to Response 13-8.

Response 13-4

Comments noted. Refer to Response 13-8.

Response 13-5

Comments noted. Refer to Responses 11-5, 11-17, and 13-8.

Response 13-6

Comment noted. A future study of alignment options to serve Candlestick Point with light rail would examine this route, if and when such a study is initiated by the City.

Response 13-7

As indicated in Mr. Judd's follow-on comment letter of July 9, 1998, the *Bayshore Transit Study* (December 1993) does not contain significant discussion of alternative alignments east of Highway 101. During the initial planning phase, Tuntex proposed an alternate alignment to Candlestick Point and Executive Park. It was not included for further study because it did not respond to the service needs of the Bayview Hunters Point and Visitacion Valley communities. During the scoping process for the present DEIS/DEIR, such a route was not introduced by anyone, nor was there any testimony at any Public Transportation Commission or Planning Commission hearings between August 1996 and June 1998 indicating a preference for this route. In addition, the San

Francisco Transportation Authority approved File #PPC110491 on December 16, 1991, requiring that transit improvements funded with sales tax funds stay within the County limits.

Response 13-8

As noted in Response 11-7 above, the alternatives and design options to be analyzed in the DEIS/DEIR were defined by the San Francisco Public Transportation Commission in July of 1997, following a comprehensive Systems Planning Study that considered many Corridor alternatives. It is on the basis of this decision and extensive community input (including over 120 public meetings) that the Third Street Light Rail Project was defined as the primary trunk route to serve the Bayview Hunters Point community and Visitation Valley. Servicing these communities was implicitly seen as a greater priority than servicing Universal Paragon's proposed development, particularly since the proposed trunk route could later be enhanced through shuttle services and extensions to the east, west, and south.

As noted in the environmental document, the proposed route would meet the purpose and need defined for the Project. It would not preclude future consideration of possible extensions from the trunk line to serve other possible future developments like Candlestick Mall or redevelopment of Hunters Point Shipyard. The San Francisco Transportation Authority Countywide Transportation Plan is currently being prepared to address these future, long-term planning issues.

The shuttle bus service from the Caltrain Bayshore Station is described in the environmental document to provide service from the Third Street light rail line to other possible developments in the area, if and when a need for service becomes feasible. As an important locally-funded project, the Third Street Light Rail Project can proceed into final design and construction while these other possible projects are defined to a point that would allow quantitative analysis.

Response 13-9

The DEIS/DEIR analyzes a two-phase project in its entirety, even though the second phase may not be completed for some time. Potential future extensions beyond the two phases have not been programmed and funded. Potential future extensions would require substantial, additional planning and public input. Piecemealing does not apply to possible future projects that are not yet defined to a point that would allow detailed analysis in an environmental document.

Response 13-10

See Responses 11-7 and 13-8.

Response 13-11, 13-12, 13-13

See Response 11-7. In addition, the *Detailed Definitions of Alternatives, Working Paper #3* and the *Travel Demand Forecasting Results, Working Paper #4* provide more detailed discussion and analysis of the three alternatives described in the DEIS/DEIR. The complete information provided in the public record, and available for public review, is far from perfunctory and describes in detail the comparative differences between alternatives.

As stated in Mr. Judd's follow-on comment letter of July 9, 1998, the initial planning process *(Bayshore Transit Study)* did not consider alternative alignments to Candlestick Point and beyond (though some are mentioned as possible future branch lines or extensions) because it did not serve the needs of the Bayview Hunters Point and Visitacion Valley communities.

The alternatives evaluated in the DEIS/DEIR are responsive to the Purpose and Need for the Project and, in particular, the Need for Transportation Improvements in the Corridor (page 1-3 of the DEIS/DEIR). Among the needs defined by community representatives are the integration of transportation improvements with community revitalization along Third Street (see page 1-7 of the DEIS/DEIR) and, as indicated in the South Bayshore Area Plan of the City's General Plan, the integration of transit and pedestrian-oriented land use and new development along Third Street in concert with a new light rail investment.

CATELLUS

May 19, 1998

⑭

Hillary E. Gitelman, Environmental Review Officer
City and County of San Francisco
Planning Department
1660 Mission Street
San Francisco, CA 94103-2414

Re: Third Street Light Rail Project Draft EIR

Dear Ms Gitelman:

Upon review of the Third Street Light Rail Draft EIS/EIR, it appears generally consistent with the analysis presented within the Draft Mission Bay SEIR. The Third Street Light Rail Draft EIR depicts Mission Bay Alignment - Option 1 alignment provisions addressed in the Mission Bay Redevelopment Plans. It appear that the impacts of implementation of the Light Rail Segment within the Mission Bay Project Area are addressed in consideration of short-term construction related-impacts and long-term impacts resulting from project build-out. 14.1

However, the proposed Mission Bay Project does not contemplate the Mission Bay Alignment-Option 2, as analyzed in the Third Street Light Rail EIR. Therefore, we are opposed to Option 2 Alignment for the following reasons:

a) Table E-11 (page E-8) indicates that three out of four intersections in Mission Bay North would be operating at unacceptable levels of service (LOS E or F) during the p.m. peak hour in the year 2015. 14.2

b) Due to the reduced number of northbound travel lanes on the Third Street Bridge, as considered under the alignment traffic conditions on Third Street near the Channel would degrade substantially, with northbound vehicular queues extending as far south as Owens Street.

The Draft EIR identifies these transportation-related impacts as significant without implementation of adequate mitigation measures.

Thank you again for the opportunity to comment on this issue. If you should have any questions on these comments, please do not hesitate to contact me at (415) 974-4500.

Sincerely,

Don Parker
Vice President
Bay Area Development

CATELLUS DEVELOPMENT CORPORATION
201 MISSION STREET, 2ND FLOOR, SAN FRANCISCO, CALIFORNIA 94105 (415) 974-4500 FAX (415) 974-4687

Comment Letter 14

Don Parker, President
Bay Area Development
Catellus Development Corporation
201 Mission Street, 2nd Floor
San Francisco, CA 94105

Response 14-1

Comment noted that the analysis is generally consistent with the analysis presented in the Mission Bay Supplemental EIR.

Response 14-2

Comments noted. The Mission Bay EIR evaluated the two-way light rail alignment along Owens and Fourth Streets (Option 1) and did not consider one-way northbound operation along Third Street with one-way southbound operation along Fourth Street within Mission Bay (Option 2). As noted, Option 2 would result in worse traffic operations in comparison to Option 1. Option 1 was selected as part of the Locally Preferred Alternative by the PTC on June 23, 1998.

San Francisco Planning and
Urban Research Association

Citizens Planning for San Francisco's Future

[redacted]

#15

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May 19, 1998

Mr. Brian J. Kalahar
San Francisco Planning Department
1660 Mission Street
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via fax 558-6409

RE: State Clearinghouse #96102097
SF Case File No. 96.281E
Draft EIS/EIR Third Street Light Rail Project

Dear Mr. Kalahar:

SPUR is an independent urban planning organization, comprised of citizens, business leaders, and government representatives. SPUR's mission is to promote good government and sound planning from the perspective of the city as a whole.

We have had a long interest in the Third Street Light Rail Project, and we have had numerous presentations by the City and neighborhood groups at SPUR. Members of our Transportation Committee have reviewed the Draft Environmental Impact Statement/Report dated April 3, 1998.

This matter has not come before the SPUR Board and therefore does not represent official SPUR policy but rather represents comments made at our Transportation Committee and builds upon long-standing general SPUR policies relative to good transportation and land use planning. 15-1

In general, the Third Street Light Rail project appears to be one with significant benefits to the City. We strongly recommend the Light Rail Build alternative. 15-2

Given that decision, we would like to focus our comments on the adequacy of the EIS/EIR relative to the design of the line on two segments: A) the Bayview commercial core and B) the crossing of Mission Creek.

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A. Bayview Commercial Core
When examining how Third Street should be redesigned for light rail in the Bayview Commercial Core, it is clear that there are competing goals:

1. Encouraging a modal shift towards greater use of public transit by providing a faster, more convenient transit option. 15-3
2. Stimulating economic regeneration along the Third Street commercial corridor by providing easier access (including parking) to the commercial establishments and enhancing the pedestrian environment.

Both goals are valid and elements of both should be possible to achieve at the same time. The best design solutions will be those that come closest to balancing these competing goals.

From the perspective of encouraging greater use of public transit, the single most important priority is to secure a dedicated right of way for the rail vehicles. Experience with other Muni Metro lines, as well as with transit in other cities around the country, indicates that there is simply no point in making the huge investment in a light rail line if the trains will be forced to go the same speed as automobile traffic. There is no reason for the public with discretion to use transit if they can travel faster by car. And if in fact it is the goal of the merchants is to attract more customers, for most merchants, the potential for more customers to arrive by transit exceeds the potential for more to arrive by automobile. 15-4

From the perspective of creating an attractive retail environment, important issues include providing adequate and convenient customer parking and creating a good pedestrian environment. Every merchant of course wants curb parking directly in front of his or her store. Not only does this create the psychological impression of easy parking but it also provides at least a perceived safety buffer for pedestrians on the sidewalk. 15-5

Planning level studies to date have concluded that along Third Street there is *generally* not enough room to provide both curbside parking and a dedicated right of way. We ask that in the final EIR: 1) an evaluation be made of the additional travel time and operating costs for non-exclusive right of way operations through the Bayview commercial core for each of the options studied, 3) estimates be made of the impacts thereof reducing patronage, and 3) detailed designs be developed that minimize negative impacts of maintaining an exclusive right of way. Conditions do change from block to block and parcel to parcel and from precise land use to land use, as some parcels are intensely used, some are vacant, some are uses which benefit from 5-minute stop and go parking, some require hours-long parking, some can be served by angle parking around the corner, some cannot. In other cases, off-street parking may be provided on vacant parcels. 15-6

We are hopeful that a more fine-grained analysis by experienced landscape architects and urban designers will find that opportunities exist to meet multiple goals. It is likely that one overall solution as is suggested in the Options 1 through 4 will not be the most beneficial, 15-7 but rather a combination of features from the various options depending on the exact location, especially when compared with the overall costs to operations and patronage that operations in a non-exclusive will cause. 15-7

It should be noted that recently curb parking has been removed in "key stops" locations along other Muni Metro lines to provide for accessible platforms. Despite initial predictions, this has not resulted in disastrous impacts on merchants. 15-8

From a transportation perspective, bike lanes are important. However, if it is determined that they cannot be accommodated in the finite amount of right-of-way, we strongly encourage accommodations to be made in the design of the light rail vehicles to encourage transit patrons to bring their bicycles on board. 15-9

By way of conclusion, long standing SPUR policies would propose that the proper frame of evaluation of the street configuration in the Bayview commercial core *is as a commercial district, not a highway*. The overall goal is to make the street a nice place to be, not an easy place to drive through. This suggests prioritizing the potential uses of the right of way in this order: 15-10

1. Dedicated rail line rights of way / one lane of traffic in each direction
2. Wider sidewalks
3. On-street curbside parking
4. Bike lanes
5. Additional traffic lanes.

This suggests that in some locations the automobile lanes need to be reduced to one lane in each direction to accommodate other needs. By expanding the space for pedestrians, providing dedicated right of way for transit, and shrinking the space reserved for automobiles, San Francisco can live up to its goals of being a Transit First city as specified in the City Charter and creating lively commercial districts both at the same time. We request that the EIS/EIR specifically evaluate the costs and benefits of such a prioritization. 15-11

B. Mission Creek Crossing

How should the light rail line cross Mission Creek? Again, from the perspective of encouraging greater use of public transit, the single most important priority is to secure a dedicated right of way for the rail vehicles. 15-12

Option 1 has transit vehicles operating in mixed flow traffic in both directions on the Fourth Street bridge. Option 2 has northbound vehicles operating in an exclusive lane on the Third Street bridge and southbound vehicles operating in mixed flow on the Fourth Street bridge.

We recommend that other alternatives be studied, which have transit operating in exclusive lanes, such as southbound on the Fourth Street Bridge, eliminating one of the two southbound automobile lanes, and northbound on Third Street as in Option 3. Other alternatives could include provision of wider bridge design(s). While such construction represents an additional high initial cost, the entire capital cost of the Initial Operating Segment and the Central Subway is in the neighborhood of $1 billion. Experience with Muni Metro in such areas as the vicinity of the Duboce/Church Street portal and the Embarcadero Turnaround show that savings in initial construction are usually counterbalanced at best by subsequent operational costs, including reduced patronage and unaccounted for but real declines in patronage due to operational delays, and at worst by subsequent reconstruction. 15-13

In addition, there needs to be specific consideration of the impacts of other projects on the light rail system, particularly of Pacific Bell Park, so that final conclusions can be made regarding the apparent benefits of operation in both directions on the Fourth Street bridge, and of beneficial impacts on patronage that such location will have by providing direct connection with the Caltrain system. 15-14

Thank you for the opportunity to comment on this draft EIS/EIR.

Sincerely,

James Chappell
President

Comment Letter 15

James Chappell, President
San Francisco Planning and Urban Research Association
312 Sutter Street, Suite 500
San Francisco, CA 94108-4305

Response 15-1

Comment noted. SPUR comments represent the review of the Transportation Committee and not official SPUR policy.

Response 15-2

Comment noted that SPUR strongly recommends the Light Rail Alternative.

Response15-3

Comments noted concerning the competing goals and the need for the best design solutions.

Responses 15-4 and 15-5

Comment noted that the single most important priority for the use of public transit is to secure a dedicated right-of-way for light rail vehicles. Of the 5.4 miles that compare the IOS, all but 10 or 11 blocks will be in an exclusive right-of-way. At a meeting held on June 23, 1998, the PTC selected the mixed-flow design option along the Third Street commercial core, based on input from staff and the public. This design option, incorporated into the Locally Preferred Alternative, allows curb parking and sidewalk amenities.

Response 15-6

The information regarding the effects of implementing the mixed-flow option in the nine-block Third Street commercial core is discussed in the DEIS/DEIR as follows:

- Transit fleet requirements, the last paragraph on page 2-39
- Annual operating statistics for the IOS, Table 2-6 on page 2-40
- Operating statistics, the last paragraph on page 2-57
- Annual operating statistics for the New Central Subway, Table 2-8 on page 2-58
- Operation and cumulative impacts, the third paragraph on page 3-32

Because of the expression of support from Bayview Hunters Point residents for the mixed-flow option, on June 23, 1998, the PTC selected the mixed-flow option as part of the Locally Preferred Alternative.

Response 15-7

More detailed project design work will continue to refine the parking design and conditions even after the environmental review process is completed. This will be done through continued coordination and input from the Bayview merchants and community representatives. MUNI's design consultants have conducted two Corridor workshops in June and July 1998 to develop a vision and basic guidelines for streetscape and light rail station design in the Third Street Corridor. During the fall, MUNI will present alternative design concepts for public review and comment.

Response 15-8

Comment noted. No formal study of this issue has been conducted, but discussions with MUNI staff involved with the Key Stops project indicate that this is not completely correct. Businesses which depend largely on quick, "convenience" visits from patrons (i.e. neighborhood groceries, dry cleaners, cafes) appear have been adversely affected by loss of curb parking in front of their stores. Other types of businesses have not been affected. In addition, the commercial core area along Third Street is presently characterized by struggling businesses and is an area where the City hopes to bring about revitalization, with the assistance of the light rail line.

Response 15-9

Comment noted. MUNI will investigate the feasibility of bringing bikes aboard transit vehicles.

Response 15-10

Comments noted. The DEIS/DEIR does consider dedicated rail right-of-way, wider sidewalks, on-street curbside parking, bike lanes, and traffic. Community representatives were actively involved in the screening of alternatives and in the selection of the Locally Preferred Alternative.

Response 15-11

See Response 15-5. It is beyond the scope of the DEIS/DEIR to provide the requested cost/benefit analysis. Comparative costs and benefits of the alternatives analyzed in the DEIS/DEIR are provided in Chapter 7.0 Financial Feasibility and in Chapter 2.0 under Operating Statistics and Capital Costs and O&M Costs. FTA Cost Effectiveness indices are presented in Chapter 8.0 on pages 8-7 and 8-8. Additional discussion of the cost-effective indices for the Project's alternatives is presented in the *Evaluation of Alternatives Report* (February 1998), available for review at the San Francisco Planning Department.

Responses 15-12 and 15-13

One June 23, 1998, the Public Transportation Commission selected light rail operating in two directions on the Fourth Street bridge as part of the Locally Preferred Alternative. The Fourth Street bridge is on the national Register of Historic Places and a wider bridge design could impact its eligibility and historic character.

Response 15-14

The traffic impacts related to light rail operation on the Third and Fourth Street bridges are described in the last two paragraphs on page 3-45. The advantages of operating light rail only on the Fourth Street bridge, including its proximity to the Caltrain station and its one block distance from the new Giants ballpark, were apparent to the PTC when they selected this option as part of the Locally Preferred Alternative.

Chinatown Community
Development Center
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May 15, 1998

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#16

Hillary E. Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

RE: Draft EIS / EIR – Third Street Light Rail Project

Dear Ms. Gitelman,

The following comments are submitted on behalf of the Chinatown Transportation Research and Improvement Project (Chinatown TRIP) and the Chinatown Community Development Center (Chinatown CDC). Chinatown TRIP is a volunteer group of citizens concerned with improving and maintaining good transit, traffic access and parking conditions in Chinatown. Chinatown CDC is a non-profit community development organization formed in 1978 to help low-income residents of the Chinatown/North Beach area in meeting affordable housing, open space and transportation needs.

As interested members and as members of the Community Advisory Group, both Chinatown TRIP and Chinatown CDC have been active in the planning of the Third Street Light Rail Project. We are highly supportive of the project and believe that the Central Subway component is critical to its long-term success. Efficient and convenient cross-town transit connections, such as this project, which will link the now ill-served southeastern part of San Francisco with the northeast quadrant, is essential in meeting transit-first goals of the entire city. The Central Subway is even more pertinent since it establishes future connections with the Geary Corridor line. 16-1

Our comments on the Draft EIS/EIR focus on the bus operating plans. The primary concern is to maintain existing bus service between Visitacion Valley, whose residents are now primarily people of Asian decent, and Chinatown, where many of the residents of the Visitacion Valley and vicinity come for social services, shopping and jobs. Before, during and after the light rail operation, we want to ensure that the existing service on the bus lines 15, 9, 9X, 9AX and 9BX is not diminished but enhanced. These bus lines, particularly the 9 express lines, currently provide for a relatively efficient and safe connection between the neighborhood streets within the Visitacion Valley, the Portola and the Silver Terrace neighborhoods and Chinatown. The light rail, although it will serve the Visitacion Valley community with two stops, will not directly reach the neighborhood streets. 16-2

With the maintenance and the enhancement of the existing bus service in mind, Chinatown TRIP and Chinatown CDC recommend the following for both the **Initial Operating Segment** and the **Central Subway**: 16-3

- Existing bus service to and from the Visitation Valley, the Portola, and the Silver Terrace neighborhoods to Chinatown should be enhanced, not diminished since these neighborhoods will not be fully serviced by the light rail.

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formerly Chinatown Resource Center and Chinese Community Housing Corporation

- The light rail may replace the 15 line but not the 9 lines. We recommend an expanded 9 service on all the express lines to meet future capacity; it is currently above capacity serving the neighborhoods indicated above. 16-4
- We recommend the following services on the 9 lines:
    1. a full service on the 9x for weekdays and weekends, from its current south terminus to North Point.
    2. 9AX and 9BX service for peak hours only on weekdays, from their current south termini to North Point. 16-5
    3. 9 San Bruno service for evenings only, from its current south terminus to North Point.
- We suggest a separate express bus line in the Visitacion Valley and/or the Bayview Hunters' Point to run east-west from Third Street to City College, with a connection to at least one of the two light rail stops on the Bayshore Blvd. 16-6
- We suggest a better community service in the Visitacion Valley area, i.e. an enhancement of the existing 56 line, to better connect the neighborhood streets with the light rail. 16-7
- We suggest a more pedestrian friendly crossing and signal timing at the Bayshore Blvd. (i.e. at the two Visitacion Valley light rail stops.) 16-8

Thank you for your consideration of the above comments. Please feel free to contact our organizations through Jasmine Kaw, the Neighborhood Improvement Coordinator, at 415 984 1461, if you should have any questions.

Sincerely,

Gordon Chin,
Executive Director
Chinatown Community Development
Center

Michael Mah,
Chair
Chinatown Transportation Research and
Improvement Project

cc. Public Transportation Commission
Planning Commission

Comment Letter 16

Gordon Chin, Executive Director
Chinatown Community Development Center
1525 Grant Avenue
San Francisco, CA 94133-3323

Response 16-1

Comment noted. The Chinatown Community Development Center believes that the New Central Subway is critical to the success of the Project.

Response 16-2

Comment noted. As Chapter 2.0 of the DEIS/DEIR states, service on the 9, 9X, 9AX and 9BX will be continued or improved after light rail operation begins. However, the 15 bus line will be eliminated at the same time that light rail service is initiated.

Response 16-3

The proposed bus operating plans for the IOS are described on page 2-38 of the DEIS/DEIR, and the plans for the New Central Subway are presented on page 2-56. MUNI believes the range of bus services discussed in the DEIS/DEIR are consistent with this comment. For example, in Bus Service Plan A, the 9X-San Bruno Expresses would continue their current weekday-only schedule and be extended to Kearny/North Point. The 9-San Bruno would be rerouted to Kearny/North Point during evenings and weekends. In Bus Service Plan B, the 9X would operate approximately 20 hours per day seven days per week. It should be noted, however, that future bus frequencies are under the purview of the PTC which may choose to adjust frequencies based on demand (i.e., actual usage) and fiscal constraints, whether or not the current project is approved.

Responses 16-4, 16-5, 16-6

These comments appear to generally conform to the range of services represented by Bus Service Plans A and B, which maintain direct service between Visitacion Valley and Chinatown (see Response 16-3). The Public Transportation Commission will hold separate hearings between 2002 and 2003 to finalize details of the bus operating plans. Public comments will be considered as part of that process.

Response 16-7

MUNI staff are currently working with members of the Visitacion Valley community to improve the service the 56-Line affords, primarily with respect to programs at Visitacion Valley Middle School. Additionally, the 56-Line will also be part of the process described above.

Response 16-8

Comment noted. Pedestrian crossing and signal timing will be designed during the engineering and detailed design phases of the light rail project. As part of the intersection modification, pedestrian crosswalks would be provided across Bayshore Boulevard. The crosswalks would be signalized to facilitate safe pedestrian crossings. In addition, some pavement would be removed as part of the improvement, which would decrease pedestrian crossing distances. The traffic signal timing would assure standard pedestrian crossing times.

BICYCLE COALITION

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#17

May 21, 1998

Ms. Hillary E. Gitelman
Environmental Review Officer
Planning Department
City and County of San Francisco
1660 Mission Street
San Francisco, CA 94103

RE: Third Street Light Rail Project, SF EIR Case File No. 96.281E

Dear Ms. Gitelman,

Following please find the official comments of the San Francisco Bicycle Coalition (SFBC) on the draft Environmental Impact Statement/Report (EIS/EIR) for the Third Street Light Rail Project (Project). The SFBC and its more than 1,800 paid members are the voice for the eleven thousand San Franciscans who rely on the bicycle for everyday transportation, as well as the hundreds of thousands who desire to, but cannot due to the unacceptably dangerous cycling conditions on San Francisco's streets.

The SFBC looks forward to working with MUNI and the Planning Department to ensure that the downtown area will be made safely bicycle-accessible to the southeast quadrant of the city.

1. Background: Importance of Third Street in the San Francisco Bicycle Plan

The segment of Third Street from King Street to Bayshore Boulevard was approved in the San Francisco Bicycle Plan (Plan) as an essential bicycling access route to the under-served southeast quadrant of the city. The Plan recommended 1.8 meter (6.0 foot) wide bicycle lanes on Third Street between Terry A. Francois Boulevard and Bayshore Boulevard as improvements for Bicycle Route 5, to link with King Street and the Embarcadero to the north and with Bayshore Boulevard to the south. This segment is crucial because no other direct bicycle route exists to link downtown and northeast San Francisco with eastern Potrero Hill, Hunters Point, Candlestick Park, and Visitacion Valley. Indeed, even though the Plan noted that cargo trucking volume on this segment made it less than ideal as a bicycle route, it was still adopted as part of Bicycle Route 5. 17-1

The Plan also recognized that a proposed light rail project on Third Street would result in the current width of the street being unable to accommodate both light rail and bicycle lanes. Accordingly, Bicycle Route 7 was established as a safer, lower traffic volume alternate route for that portion of Bicycle Route 5 extending from Mariposa Street to Carroll Avenue.

2. Mitigation Measures needed and Unanswered Questions Remaining.

Page S-20, Table S-5 of the EIS/EIR recommends potential mitigation measures to improve the bicycle environment in the Third Street Corridor (Corridor) if the project is implemented. One measure includes improvements to Bicycle Route7 to enhance the portion of the Corridor from Mariposa Street to Carroll Avenue for bicycle travel. The SFBC supports this measure as consistent with the Bicycle Plan. 17-2

A second recommended mitigation measure is the re-striping of Third Street between Cargo Way and Cesar Chavez where on-street parking is currently prohibited in order to include bicycle lanes. The SFBC supports this measure as this segment of the Corridor includes an essential part of Bicycle Route 7.

However, this still leaves one crucial access problem regarding Bicycle Route 5 and the Corridor: Third Street south of Carroll Ave., the southern terminus of Route 7, where the Project would make Third Street inhospitable to bicycle lanes. As mitigation, Route 7 should be extended south to Gilman Ave. via Carroll Ave. and Jennings Street. From the intersection of Third St./ Paul Ave./Gilman Ave., Bicycle Route 5 will 17-3

• Dave Snyder EXECUTIVE DIRECTOR • Leah Shahum PROGRAM DIRECTOR • Mary Brown MEMBERSHIP DIRECTOR
• Stephanie Alling-Mees • Kate Bickert • Stacey Camillo • Joe Carroll • Robert Collins • Stuart Coulthard • Paul Dorn • John Fall • Kathleen Haviland • Dave Snyder
Niko Letunic PRESIDENT • Marianne Skoczek SECRETARY • Ted Strawser TREASURER

experience a significant reduction in bicycle safety unless mitigation measures are devised to improve Third Street south of that intersection. Mitigation measures should include improvements to Third Street itself, improvements to Paul Ave. and San Bruno Ave, improvement to Tunnel Ave. from Bayshore Blvd. to the multi-modal station. Another possible mitigation measure would be a direct connection from Tunnel Ave. to Bayshore Blvd. south of the Caltrain station along the right-of-way to be used by the proposed light rail. This new path would provide a safe alternative to the segment of Bayshore Blvd. between Sunnydale Ave. and San Bruno Ave. where bicycle safety will be significantly impacted by the proposed project. 17-3

Finally, the SFBC supports the recommended mitigation measure of allowing bicycles on-board Third Street light rail vehicles in additional to the improvements suggested above, especially in light of the resultant complexity of these alternate routes as impacted by the Project. 17-4

Sincerely,

Kathleen Haviland

Kathleen M. Haviland
Board Member, San Francisco Bicycle Coalition

Comment Letter 17

Kathleen Haviland, Board Member
San Francisco Bicycle Coalition
1395 Market Street, #215
San Francisco, CA. 94102

Response 17-1

Comment noted. The importance of Third Street as a bicycle route is also discussed on pages 3-24 and 3-25 of the DEIS/DEIR.

Response 17-2

Comments noted. Bicycle mitigation measures are discussed in more detail on pages 3-69 and 3-70 of the DEIS/DEIR, including retaining a wide outside travel lane and installing bicycle actuation detectors on all new traffic signals along Third Street. (See Response 17-3 below.)

Response 17-3

As discussed on page 3-69 of the DEIS/DEIR, striping of bicycle lanes on both sides of Third Street between Arthur Street/Cargo Way and Cesar Chavez Street is recommended.

The following paragraph has been added to page 3-69 of the DEIS/DEIR:

> **Since Route 7 terminates at Carroll Avenue (from Keith Street), consideration should be given to extending Route 7 along Carroll, Jennings, and Gilman Avenues to Third Street's intersection with Gilman/Paul Avenues, where other bicycle routes meet. South of Gilman Avenue, opportunities to improve bicycle circulation along Third Street and Bayshore Boulevard should be further explored. For example, if found feasible during final design of the light rail system, bicycle lanes could be striped on both sides of Bayshore Boulevard.**

The second to last paragraph on page 3-69 of the DEIS/DEIR has been revised as follows:

> Many bicycle riders would still prefer traveling along Third Street~~, instead of along Route 7, due to the directness and relative levelness of the route.~~ **and Bayshore Boulevard in lieu of alternative, less direct routes.** The Bicycle Plan states a goal of...

The first paragraph in the second column in Table S-5 on page S-20 of the DEIS/DEIR have been revised as follows:

> Bicycle lanes would not be possible along Third Street if light rail were implemented (except with the one-lane design option in the Third Street commercial core). Bicycle travel would be constrained along Third Street **and Bayshore Boulevard**. *Mitigation measures to improve* ***the*** *bicycle environment within the Corridor, such as restriping portions of Third Street (between Cargo Way and Cesar Chavez) for bike lanes where on-street parking is currently prohibited, improving* ***and extending*** *Bicycle Route 7,*

providing improved bicycle circulation south of San Bruno Avenue, and possibly permitting bicycles on Third Street light rail vehicles.

Response 17-4

Comment noted. Additional bicycle mitigation measures are discussed on pages 3-69 and 3-70 of the DEIR/DEIR. As indicated in Response 15-9, MUNI will study the feasibility of bringing bikes aboard transit vehicles.

C. Individuals

#18

2354 18th Avenue
San Francisco, CA 94116
May 14, 1998

Brian Kalahar
San Francisco Planning Department
1660 Mission St.
San Francisco, CA 94103

Dear Mr. Kalahar,

Thank you for the opportunity to review the Third St Light Rail Draft EIS. I have been riding Muni to school or work on a regular basis for the past 30 years. The primary goal of public transit must be to serve its riders. My main comments are:

- The EIS does not establish the need for a 5.4 mile Third St Light Rail line. Transportation improvements needed can be met by additional bus service and by extending the Muni Metro Embarcadero line a distance of 0.6 miles to Mission Bay.

- The EIS states that Light Rail (IOS) is superior to the No Build/TSM alternative in the following areas, but insufficient analysis is provided to support these conclusions:
    - Reliability
    - Traffic Congestion
    - Mobility
    - Travel Times
    - Gasoline Consumption
    - Pollutant Emissions

- The EIS does not adequately consider financial goals. Reasonable cost and efficient use of limited financial resources were stated as project goals, but they were not addressed in the report.

- The EIS analyzes a Light Rail option that assumes a dedicated right-of-way and street improvements (e.g. landscaping), whereas the No Build/TSM alternative does not. Almost all the benefits of light rail accrue from its dedicated lanes and street improvements, so meaningful comparison of alternatives is not possible.

As a result, the EIS finding that Light Rail is a superior environmental alternative to No Build/TSM is not warranted and further analysis is required. The attachment (9 pages) contains detailed review comments, including an explanation of the above.

18-0

Sincerely,

Max Pong

Max Pong

cc. Hillary Gitelman,
Environmental Review Officer

EIS Review Comments

	Page	Comment
18- 1	S-1 2nd para	Transportation improvements needed for the Third St corridor can be met by extending the Muni Metro Embarcadero line to Mission Bay. A 0.6 mile light rail extension from 3rd/King Sts to 3rd/Mariposa Sts, plus additional bus service would be adequate. This also lessens environmental impacts. The EIS does not establish the need to extend light rail an additional 4.8 miles to Visitation Valley.
18- 2	S-1 last para	Claim of inadequacy has no basis other than someone's "perception". The No. 15 bus provides good access to the Muni Metro and BART stations at Balboa Park.
18- 3	S-12 Table S-4	Travel times from Arleta/Bayshore must consider the much faster 9X express bus. Example: Travel time for Arleta/Bayshore to Third/Market should be 25/34 minutes, not 36/45.
18- 4	S-12 Table S-4	The IOS travel times are based on dedicated lanes. Provide travel times for mixed flow case. Third St merchants favor the mixed flow configuration; it will likely be implemented.
18- 5	S-14 4th para	Add that no bicycle lanes could be added.
18- 6	S-21 last para	Light rail has no significant advantage in reliability, mobility and travel times. See comments 9 and 10.
18- 7	S-29	Residents along the J, L and N lines are complaining about whining noises from the Breda cars. This noise occurs everytime the vehicle decelerates from 20 to 10 mph. Residents also complain of vibration problems. Real life experience must be mentioned.
18- 8	S-30 1st bullet 4th bullet 5th bullet	Light rail is not superior to TSM in terms of congestion, pollutants and gasoline consumption. Common sense indicates that light rail increases traffic congestion because two of six traffic lanes are removed. Tables 3-9 and 3-10 show light rail causes greater delays at intersections and slower travel speeds compared to the TSM alternate. This leads to greater gasoline consumption and pollutant emissions. Even after extensive mitigation measures are implemented, Table 3-12 shows light rail still causes greater congestion. Page 3-41 states "somewhat degraded traffic operations would result" with light rail. Tables 5-6 and 5-7 show no improvement in air quality and a negligible decrease in regional pollutant emissions with light rail.

	Page	Comment
18-9	S-30 2nd bullet	Light rail has no significant advantage in reliability. Single track light rail has inherent reliability problems. A traffic delay, breakdown, or accident that blocks the track at one location affects the entire system because one vehicle cannot pass another one. Caltrain Muni riders complain that the newly-opened Embarcadero Muni Metro line is unreliable and inflexible, and most continue to ride the existing bus system. The 1998 RescueMuni survey found that Muni Metro had the worst on-time performance (late 35% of the time), whereas diesel buses had the best. The J and N lines would be extended to service Third St IOS. These lines are unreliable due to lack of surface right-of-ways, congestion in the Market St subway, and overcrowding. Third St rail can only be as reliable as its weakest link; it will suffer similar reliability problems.
18-10	S-30 3rd bullet	Light rail has no significant advantage in mobility and travel times. The No. 15 bus already provides good access to the Muni Metro and BART stations at Balboa Park. Light rail (IOS) would decrease mobility because the No. 15 bus, which provides a direct connection to Chinatown, would be eliminated. The NCS would restore this connection, but there is no assurance that the NCS will be built. Even if it were constructed, the NCS would not begin operation until 15 years after IOS operation. Saving 4-6 minutes on an IOS trip from the Bayview to Downtown is not a significant time savings. Riding a light rail vehicle instead of a bus does not increase one's mobility. The EIS states "There would be no net increase in transit service compared with the No Build/TSM Alternative".
18-11	S-30 S.5.1 1st senten	Muni repeatedly states they do not have adequate funding to fully service the existing routes. Muni states their reliablity problems are due to lack of drivers and equipment, as well as inadequate maintenance and supervision.
18-12	S-31 3rd para	It was difficult to obtain federal funding for the BART extension to SFO. State why the New Central Subway, a more local and less cost-effective project, will likely receive federal funds.
18-13	S-32 1st para	Light rail will decrease the mobility of those traveling to Chinatown. See comment 10. Almost all the benefits of light rail accrue from its dedicated right-of-way. A TSM alternative with limited stop bus service, express buses and/or transit only lanes must be analyzed.
18-14	S-32 4th bullet	Light rail has no significant advantage in reliability and travel times. See comments 9 and 10.

	Page	Comment
18- 15	S-32 4th bullet	Light rail has worse accessibility because there are fewer stops. Handicap access is impaired because light rail vehicles do not have a wheelchair lift.
18- 16	S-32 6th bullet	State basis for potential economic revitalization. The F-Line has not revitalized Market St. from 5th St. to 9th Sts. Mission St. residents complain that the 16th St BART station attracts criminal activity. Merchants complain the Powell St BART station and cable car turnaround attracts panhandlers and hustlers. Page 5-12 states "Modifications to Third St to accommodate light rail, including the reduction of vehicular travel lanes, are likely to discourage traffic, which could reduce the customer base for some local businesses".
18- 17	S-32 7th bullet	The electrical power consumed by light rail vehicles is not "clean" (pollutant-free). The Hunters Point and Potrero Hill power plants located near Third St. supply almost 50% of the city's electricity on some days. Furthermore, Third St residents claim that pollutants from these power plants are causing high rates of asthma and other illnesses in the community.
18- 18	S-32 last sent	The EIS analysis is inadequate to support the conclusion that Light Rail is the superior alternative (see above comments). Many of the benefits of Third St Light Rail arise only if both the IOS and NCS are constructed. The executive summary must mention that there is a 15 year gap between completion of the IOS and NCS. There is a good possibility that the NCS will not be built in the foreseeable future due to lack of funding. The Third St Light Rail EIS should include the IOS portion only.
18- 19	S-34 2nd para	Add discussion of cost effectiveness. The fact that TSM costs $54 million and IOS costs $402 million to provide transit service to a similar number of riders cannot be ignored. Cost effectiveness must consider the following: Incremental passenger cost IOS: $402 million / 72,070 additional riders = $5578 TSM: $54 million / 69,620 additional riders = $776 Total corridor passenger cost IOS: $402 million / 138,090 corridor riders = $2911 TSM: $54 million / 135,640 additional riders = $398 New rider cost IOS: $402 million / 2450 new riders = $164,000 per new rider

		Page	Comment
18-	20	S-33 5th para	Has the "concern" that quality is not comparable been substantiated by transit studies? It is imprudent to spend $402 million based on a mere concern. Consider alleviating this concern by TSM alternatives such as express buses and transit only lanes.
18-	21	S-33 last para	The TSM alternate does in fact provide economic revitalization benefits. The TSM alternate meets or exceeds 3 of the 4 economic revitalization goals shown on p. 1-10.
18-	22	S-33 last para	Consider a revised No Build/TSM alternative that adds infrastructure investments (street redesign, sidewalk improvements and landscaping).
18-	23	S-34 1st para	The Muni Metro system is unreliable and overcrowded, and draws the most complaints from passengers. The numerous problems with the current system are neither understood nor have been solved. Were community residents provided this information?
18-	24	1-3 3rd para	Delete paragraph. Traffic congestion is not unique to Third St Corridor. It is a citywide problem. Even the dedicated rail lines in the Market St subway suffer from congestion at rush hour.
18-	25	1-3 4th para	Disagree that transit access is inadequate. See comment 2.
18-	26	1-3 last para	Disagree that mobility is inadequate. The No. 15 bus provides a direct connection to the Balboa St BART station, and BART is constructing an extension to the airport. It is more time-consuming and circuitous to take light rail to Embarcadero, and then transfer to BART. Furthermore, the nearby 7B SamTrans bus runs to the airport.
18-	27	1-7 2nd para	Numerous streetcar and cable car lines throughout the city have been removed and replaced with bus service. There is no proof this has depressed any neighborhood.
18-	28	1-10 2nd row	Service reliablity must include criteria in addition to miles of exclusive right-of-way. Add flexibility, which is the ability for a vehicle to change its route. Obviously light rail has poor flexibility because it cannot simply drive around a problem. Add criteria to include real-life experience with Muni light rail.
18-	29	1-11 Financial Goal	Add criteria to address "Increase transit use and reduce travel time at a reasonable cost" (p. 1-1) and "Implement transit improvements that provide for the efficient use of limited financial resources" (p. 1-9). These goals have been ignored in evaluation of alternatives. Capital cost must be included in criteria.

	Page	Comment
18. 30	2-12 3rd bullet	Muni is building a new bus yard at Islais Creek for 165 buses. Can this yard accommodate the 40 new buses in the No Build/TSM alternate? If not, expand this yard to do so. This will lessen environmental impacts.
18 31	2-13 6th bullet 7th bullet	Trains in the Market St subway normally consist of three cars, 2 N's and 1 J. It would be logical to couple and uncouple the J and N's at Mission Bay. The 3rd and 4th St bridges should accommodate at least a 3-car train. Administrative procedures cannot be relied upon to limit bridge usage to two-car trains. Bridge should be retrofitted to safely accommodate 4-car trains.
18. 32	2-18 last para	Construction of a parking garage violates the city's "Transit First" policy.
18. 33	2-20 Fig 2-7	Consider using a loop for turning back the trains. This is simpler and more reliable. Let's not repeat the Muni Metro Embarcadero Station problem.
18. 34	2-30 2nd para	The fact that streetcars operated in the past provides no assurance that the bridge is adequate. The new Breda cars weigh 80 tons each, much more than a streetcar. A two-car train would weigh 160 tons.
18. 35	2-31	I-280 freeway ramps and Pacific Bell Park are both located on King St. Severe traffic congestion will result because light rail will be making left and right hand turns to and from King St. Also 30,000 persons exiting Pacific Bell Park will affect reliability of IOS. Fans jamming onto the train and pedestrians crossing the street will disrupt service. Has this been addressed?
18. 36	2-37 2nd para	Single J cars will service the Third St rail line from Mission Bay to Visitation Valley. The main advantage of light rail is high capacity (i.e., 2 to 4 car trains are possible). Why are we building high-capacity light rail past Mission Bay if the passenger demand does not exist?
18. 37	2-45 last para	There have been safety problems with vehicles and pedestrians on the Embarcadero Muni Metro extension line. Mirrors and train approaching warning lights have been added. Has this been considered?
18. 38	2-59 2nd para	The ATCS is $30 million over budget and 5 years behind schedule. Consider installing a simpler system.
18. 39	2-71	EIS shows $3 million per vehicle. The latest Breda vehicles that Muni has on order will cost $3.7 million each.

	Page	Comment
18· 40	2-71	EIS shows $506 million to construct 1.75 mile long NCS. The Muni Metro Embarcadero turnback cost $220 million for a 0.4 mile long tunnel and took 11 years to build. EIS cost estimate seems low.
18· 41	2-73 1st para	Add "reasonable cost" and "efficient use of limited financial resources". These were listed as goals on p. 1-1 and 1-9. The EIS ignores or does not adequately address these goals.
18' 42	3-17 3rd para	The Third St bridge opened 44 times/month and Fourth St bridge 33 times/month. Address its effect on transit reliability.
18· 43	3-29 2nd para	Transit travel time is not a significant consideration. San Francisco residents have a high use of public transit due to lack of parking, extensive routes, and frequent service.
18- 44	3-31 Table 3-7	Travel times from Arleta/Bayshore must consider the much faster 9X express buses. Example: Travel time for Arleta/Bayshore to Third/Market should be 25/34 minutes, not 36/45.
18- 45	3-31 Table 3-7	The IOS travel times are based on dedicated lanes. Provide travel times for mixed flow case. Third St merchants favor the mixed flow configuration; it will likely be implemented.
18 46	5-5 2nd para	Justify claim that a light rail station (which is really a concrete bus stop in the middle of the street) will lead to economic revitalization. In fact, merchants on Church and Taraval Sts. complained about boarding islands in front of their stores and several islands were relocated.
18 47	5-10 4th para	Justify statement that neighborhood is underserved by transit improvements.
18· 48	5-12 2nd para	First sentence implies that a Third St resident would turn down a job if he had to ride a bus to work, but would take the job if he could ride light rail. Is this true?
18 49	5-12 2nd para	EIS states "Bayview Hunters Point residents surveyed believe that light rail was an important milestone for change to improve the image of Third Street and to provide a more efficient and attractive mode of travel in comparison to the bus that would improve accessibility and integrate Bayview Hunters Point with the rest of the City". Transportation improvement should be the primary goal, not image.

		Page	Comment
18.	50	5-16 3rd para	EIS states "Residents of the City's southeastern quadrant have complained that the Corridor has a disproportionate share of facilities such as sewage treatment plants, hazardous waste recycling centers and other industrial facilities, but that they have not benefited from a fair share of public investments such as light rail lines. The Project is perceived by many area residents as an overdue public investment that will improve several neighborhoods that have been overlooked in the past, and that will strengthen local businesses." Transportation improvement should be the primary goal, not public investment.
18.	51	5-16	The No. 15 bus to Chinatown will be eliminated if the IOS is implemented. Many Asian residents travel between Third St and Chinatown. They would suffer until the NCS was completed 15 years later, and there is no assurance the NCS will be constructed. This raises environmental justice and mobility issues.
18.	52	5-39	Provide estimate of utilities consumption during operations.
18.	53	5-41 last para	The electrical power consumed by light rail vehicles is not pollutant-free. The Hunters Point and Potrero Hill power plants located near Third St. supply almost 50% of the city's electricity on some days. Add annual electrical power consumption, pounds of pollutants emitted, and impact on air quality.
18.	54	5-62 5th para	Provide estimate of hazardous waste generation rates during operation and intended disposal method.
18.	55	5-78	Show quantity of gaseous pollutants (e.g. solvents) released into atmosphere during facility operation.
18.	56	5-92	Noise from the new Breda cars is a major complaint from residents along the J, L and N lines. Mitigation may be necessary.
18.	57	6-4	Disagree with the EIS conclusion that Light Rail is superior to the No Build/TSM alternative. Light rail has no significant advantage over TSM in reliability, mobility, travel times (IOS), gasoline consumption and air quality. TSM is superior to light rail in decreasing traffic congestion, and TSM meets 3 of the 4 economic revitalization goals. See comments 8, 9, 10 and 21.
18.	58	7-22	It was difficult to obtain federal funding for the BART extension to SFO, an improvement that will serve the entire Bay Area. State why the New Central Subway will likely receive federal funds.
18.	59	8-3 Table 8-1	Service reliablity must include criteria besides miles of exclusive right-of-way. Add flexibility, which is the ability for a vehicle to change its route. Obviously light rail has poor flexibility because it cannot simply drive around a problem.

		Page	Comment
18·	60	8-3 Table 8-2	A Third St. Muni Metro line would only reduce the travel time from the Bayview to Market/Third St. by 4-6 minutes, compared to the existing No. 15 bus line. This is not a significant time savings. A rating of very good for value of time savings, travel time and average speed is not justified for the IOS options.
18·	61	8-3 last para	The 9X bus is faster than light rail IOS for Visitation Valley residents. This must be considered.
18·	62	8-5 Table 8-4	Disagree with very good rating for air pollutants, greenhouse gases and energy consumption. See comment 8.
18·	63	8-5 1st para	The electrical power consumed by light rail vehicles is not "clean" (pollutant-free). The Hunters Point and Potrero Hill power plants located near Third St. supply almost 50% of the city's electricity on some days. Furthermore, Third St residents claim that pollutants from these power plants are causing high rates of asthma and other illnesses in the community.
18·	64	8-8 Table 8-8	Capital costs must be considered. See comment 29.
18·	65	8-8 Table 8-9	Cost effectiveness for No Build/TSM should be excellent, whereas IOS should be poor. TSM will cost $54 million to accommodate 69,620 additional riders. Light rail will cost $402 million to accommodate 72,070 additional riders.
18·	66	8-10 Table 8-11	TSM should not be rated poor for economic revitalization. TSM meets 3 of the 4 economic revitalization goals shown on p. 1-10.
18·	67	8-10 last para	The TSM alternative does in fact service the new Giants ballpark (Pac Bell Park). The No. 15 bus passes within one block of the new ballpark, as does light rail with the Fourth St configuration.
18·	68	8-11 Table 8-13	A Third St. Muni Metro line would only reduce the travel time from Third/Palou to Market/Third St. by 4-6 minutes, compared to the existing No. 15 bus line. This small difference does not justify rating the bus fair and IOS good to very good.
18·	69	8-11 Table 8-13	Travel time from Bayshore/Arleta to Chinatown must be based on riding the 9X express bus, not the 15 local bus. TSM should be rated better than fair. The IOS should be rated poor rather than n/a.
18·	70	8-11 Table 8-13	The IOS will eliminate 773 to 842 of the existing 1675 parking spaces along Third St (p. S-13). IOS cannot have an excellent or good rating for parking.
18·	71	8-12 1st para	EIS states cost per new rider is $9.96 for IOS. Page 8-8 states cost is $30.60. I calculate $164,000 ($402 million / 2450 new riders).

		Page	Comment
16.	72	8-12 3rd para	Saving 4-6 minutes on a 44 minute trip from Third/Palou to Third/Market is not significant.
18.	73	8-13 Table 8-15	No federal or state funds have been allocated for the NCS (p. 8-14). Financial commitment should be rated poor, not good. It will be difficult to obtain federal funding for $675 million of the $865 million cost for 1.75 miles of rail.

C. INDIVIDUALS

Comment Letter 18[*]

Max Pong
2354 18th Avenue
San Francisco, CA 94116

Response 18-0

See subsequent specific comments.

Response 18-1

Light rail is superior to bus service south of Mission Bay because it: 1) offers support for revitalization efforts; and 2) uses an exclusive right-of-way, improving service reliability and travel time. As is documented in the DEIS/DEIR, environmental impacts from the Light Rail Alternative can be mitigated to a less-than-significant level.

Response 18-2

In MUNI's opinion, connections to the MUNI Metro system and BART at Market Street are much more important than those available at Balboa Park Station. The 15-line bus does not offer adequate connections to the rail system at Market Street. The IOS would connect to four BART stations along Market Street.

Response 18-3

When the New Central Subway is operational, travel times from Arleta/Bayshore will be faster than the 9X-San Bruno express buses. In-vehicle travel time on the 9X would be 35 minutes, while in-vehicle time on the New Central Subway would be 30 minutes. (See page 8-4 of the DEIS/DEIR and the *Evaluation of Alternatives Report,* page 3-6.)

Response 18-4

Travel times under the mixed-flow option would be an average of two minutes longer than the exclusive right-of-way option during peak periods, between points south of the Third Street commercial core and Downtown. (See page 8-4 of the DEIS/DEIR and the *Evaluation of Alternatives Report,* page 3-6, available for review at the San Francisco Planning Department.)

Response 18-5

This is covered on page S-14 under the heading "Bicycle Circulation."

Response 18-6

See Responses 18-9 and 18-10.

Response 18-7

Results of noise impact analysis show no significant impacts (page 5-84). The DEIS/DEIR does acknowledge (page 5-88) that there will be vibration impacts (specific locations are cited) and indicates that these impacts can be mitigated through modifications to the vehicles' suspension system as well as special track treatment. It is important to note that the track along Third Street would be newly constructed and would be designed in such a manner as to minimize vibration impacts (refer to E-10 of "Staff Initiated Changes").

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[*] Responses are to the detailed comments in the table attached to the cover letter.

Response 18-8

Increased congestion from the TSM Alternative results from placing additional buses into service to meet anticipated demand, especially in Mission Bay, as well as a small increase in automobile trips, which would have been made on light rail. The air quality technical analysis projects a slight decrease in pollutants from the Light Rail Alternative on a citywide basis, though benefits of removing diesel buses would be more noticeable on a localized basis in the Corridor. The DEIS/DEIR acknowledges that traffic congestion would increase along Third Street for any alternative (refer to page 3-46, last paragraph). Although the Light Rail Alternative would require the removal of one traffic lane in each direction along Third Street, the increased congestion would be balanced by the increased transit ridership and fewer buses on Third. In addition, the New Central Subway would attract riders who may otherwise use private vehicles in the Downtown area, thereby addressing congestion problems along Stockton and Third Streets.

Response 18-9

A significant cause of transit unreliability in the Third Street Corridor is Downtown traffic congestion. Light rail operating in an exclusive right-of-way (or subway) will eliminate this problem. Crossover track will be placed at regular intervals along the alignment to allow LRVs to maneuver around blockages, if they happen to occur.

In regard to the new light rail extension to the Caltrain station, the current E-line is only a shuttle service. MUNI has not yet instituted through-routed service on The Embarcadero. When the Automatic Train Control System (ATCS) becomes operational this year and the N-line is through-routed to the Caltrain station, delays in the Market Street Subway will be mitigated.

Response 18-10

The connection currently provided by the 15-line bus between Visitacion Valley and Chinatown will be replicated by other bus lines (see IOS Bus Plans A and B on page 2-38). The New Central Subway will provide a high quality connection between Visitacion Valley and Chinatown.

Response 18-11

The Financial Feasibility (Section 7) of the DEIS/DEIR indicates that MUNI will be able to fund operating costs of the IOS and the New Central Subway, including drivers and supervisors. Because LRVs have greater capacity than buses, fewer drivers would be required for the Light Rail Alternative than for the all-bus No Build/TSM Alternative to meet 2015 demand. As presented in Table 2-13 (page 2-73), the 2015 annual operating costs are almost exactly the same for the IOS and the No Build/TSM Alternative, while the operating costs of the New Central Subway are slightly higher.

Response 18-12

The implementation dates for the New Central Subway are fairly far in the future (about 10 years) since MUNI will likely have to wait until the federal commitment to the BART extension to San Francisco International Airport is fulfilled before receiving funds for the New Central Subway. The new federal transportation act (TEA-21) identifies the Project in the New Starts Program as eligible for design and construction funds.

The New Central Subway differs from the BART extension project in that it is intended to improve transit service to an intensively used urban transit corridor, providing significant mobility improvements, reduction of congestion and connections to the future Chinatown and Geary rail corridors. Because the Project upgrades transit service in a local corridor and connects with BART, a regional system, the two projects are complementary.

Response 18-13

For the IOS, trips between the southern end of the Corridor and Chinatown would be accommodated on buses much as they are today. As indicated on page 2-38 of the DEIS/DEIR, IOS Bus Service Plan B offers expanded service (evenings and weekends) on the 9X-line. After the New Central Subway is constructed, travel times between Visitacion Valley and Chinatown will be shorter on light rail than the 9X. The all-bus alternative (No Build/TSM Alternative) would add buses to the 15-line to meet 2015 demand (but not increase 9X service). Since the buses would operate in mixed traffic, the increased traffic congestion along Third Street would slow bus service and reduce service reliability. Other bus alternatives were studied in the *Bayshore Transit Study* and rejected at that time. Nonetheless, if an exclusive right-of-way and stations were provided for buses along Third Street and Bayshore Boulevard, the all-bus alternative's capital costs would be subtantially greater without providing the reduced emission, fuel, and noise advantages of light rail.

Response 18-14

See Responses 18-9 and 18-10.

Response 18-15

It is true that there would be fewer stops on the light rail line than there currently are for the 15-Third bus line. However, the light rail project includes very close stop-spacing (3-4 blocks) in Bayview where many trips originate. Station platforms will be accessible from either end of station blocks. By law, all stops on a new light rail line must be accessible to wheelchairs. LRVs will stop at high-level platforms, offering access for wheelchairs into any door of the vehicle (page 2-33 of the DEIS/DEIR). Like the MUNI Metro platforms along The Embarcadero, the ramps leading to the surface platforms would be relatively steeply inclined.

Response 18-16

In general, the light rail line is seen as a major, visible public investment which will increase the level of attractiveness, safety and lighting along the Third Street commercial core in Bayview, as well as concentrating foot traffic around stations and making access to and from the area easier. Although through-traffic may decrease, in the mixed-flow option, the retention of parking along

Third and the increased pedestrian traffic is expected to expand the overall customer base. MUNI has commissioned a report (*Third Street Light Rail Economic Revitalization Strategies Report,* available for review at the San Francisco Planning Department) which discusses these topics in greater detail.

Response 18-17

The electricity which powers MUNI's electric vehicles comes from City-owned Hetch-Hetchy via the PG&E grid, not from PG&E power plants in the City.

Response 18-18

In terms of traffic congestion and pollution, the IOS is environmentally superior to the No Build/TSM Alternative because it displaces diesel buses which emit more pollutants, produce more noise, and have higher fuel costs than light rail.

Response 18-19

Cost effectiveness is calculated according to FTA guidelines. Cost effectiveness is discussed in Section 8, page 8-7. A more detailed discussion of the methods of calculating cost effectiveness is presented in *Evaluation of Alternatives Report,* available for review at the San Francisco Planning Department, pages 3-24 and 3-25.

Response 18-20

The No Build/TSM Alternative was fully analyzed in the DEIS/DEIR document (pages S-31 – S34).

Response 18-21

The No Build/TSM Alternative as defined meets one of four economic revitalization objectives (maintain adequate auto/truck access), identified in Table 1-3 on page 1-10. Unlike the Light Rail Alternative, which fulfills all economic revitalization objectives, the No Build/TSM Alternative would not provide streetscape design or pedestrian circulation improvements in the Third Street commercial core.

Response 18-22

Although streetscape design was not included for the No Build/TSM Alternative, its inclusion would increase the alternative's capital cost substantially, without providing the same level of environmental benefits (e.g. reduced pollution, diminished noise, reduced fuel consumption) as light rail.

Response 18-23

As indicated in Response 18-9, MUNI Metro's reliability will improve once the new Automatic Train Control System is instituted this year. The public participation program provided a series of community meetings, public workshops and hearings to receive community input on the alternatives considered and the environmental analysis for the Project. Community preference has been overwhelmingly in favor of the light rail line.

Response 18-24

The Third Street Light Rail Project specifically addresses the transportation needs of the communities in the Third Street Corridor as well as the impacts of the alternatives considered for this Corridor. Congestion in the Market Street Subway will be alleviated by the new Automatic Train Control System.

Response 18-25

See Response 18-2.

Response 18-26

See Response 18-2. Also, the light rail line will provide a connection to the Caltrain Bayshore Station, which offers access to the airport.

Response 18-27

The second paragraph on page 1-7 states that the original streetcar line along Third Street "helped spur the development of the Bayview Hunters Point Commercial District." This does not imply that the removal of the line depressed the neighborhood.

Response 18-28

Miles of exclusive right-of-way is an inexact, but quantifiable, criterion used by MUNI for measuring transit reliability.

Response 18-29

The Project goals and objectives were developed in concert with and approved by the Technical Advisory Committee and the Community Advisory Group and were described at community meetings. The Evaluation of Alternatives, (Chapter 8.0), uses financial and capital cost criteria for examining the trade-offs among alternatives.

Response 18-30

It is not be possible to expand the Islais Creek bus yard facility beyond the planned size because the site is constrained by other (private) uses and by Islais Creek.

Response 18-31

When Automatic Train Control System is operational, N and J trains will no longer be coupled in the subway. The N-line, generally operating with two-car trains, would be extended through and turned back south of Mission Bay, when demand warrants. The J-line, operating as one-car trains, would be extended the length of the Third Street Corridor alignment. The combination of the N- and J-lines operating in the Corridor could accommodate the travel demand projections presented in Table 3-6 (page 3-30). The Fourth Street bridge is being retrofit to accommodate light rail. The bridge is not a barrier to use of four-car trains. Surface platforms are designed to accommodate two-car trains only.

Response 18-32

Although a parking garage is being cleared in the environmental document, at this time MUNI does not intend to construct one initially (see E-1 of "Staff Initiated Changes").

Response 18-33

The level of service (number of LRVs per hour) at the Caltrain Bayshore Station can be adequately accommodated by a crossover configuration for turning back light rail trains. A turnaround loop would be constructed, perhaps in 2008, south of Mission Bay (using 18th, Illinois and 19th Streets) to provide increased service levels to Mission Bay when warranted.

Response 18-34

Engineering studies done for the Project indicate that the bridges can handle the necessary loads to accommodate light rail trains using the new Breda cars. (See *Study to Investigate the Structural Condition of Three Existing Steel Bascule Bridges Crossing Mission and Islais Creeks and the Third Street/Bayshore Boulevard Bridge Crossing US Highway 101,* ICF Kaiser Engineers, June 19, 1997, available for review at the San Francisco Planning Department.)

Response 18-35

Traffic studies show that the projected 2015 Level of Service at the Fourth/King intersection would be at "F" in the a.m. peak and at "E" in the p.m. peak whether or not a light rail line is built (Table 3-9, page 3-45). Most traffic related to the new ballpark would be on Third Street. Since light rail will operate northbound and southbound on the Fourth Street bridge (see E-7 of "Staff Initiated Changes") and benefit from an exclusive right-of-way and synchronized signalization at Fourth and King, traffic and pedestrian circulation impacts resulting from Pacific Bell Park events are not expected to substantially affect light rail operation.

Response 18-36

MUNI's analysis shows that single-car light rail service south of Mission Bay is the most efficient operating plan. A second car can always be added for special events (i.e. football games at Candlestick Park) when higher demand is expected. With initiation of service in the Central Subway, headways will be reduced to 5 minutes, which will increase capacity. While high capacity is one important advantage of light rail, there are others, including increased reliability and support for revitalization efforts, which are equally important.

Response 18-37

These safety issues, which are addressed on page 2-45 of the DEIS/DEIR, include: 1) use of an exclusive right-of-way for light rail; 2) signalization at grade crossings; 3) coordinated traffic signal phasing and timing to preclude motor vehicles from blocking light rail tracks; 4) use of raised station platforms; 5) inclusion of left-turn pockets; and 6) use of distinct pedestrian crosswalks.

Response 18-38

It will be necessary to operate the vehicles in the New Central Subway using the same control system used elsewhere in the MUNI Metro system. The IOS will not use the Automatic Train Control System for surface operation.

Response 18-39

The Project Financial Plan assumes a total of $3.8 million for each new Breda light rail vehicle, including sales tax. Part of this cost is contained in other budget line items, such as signaling and communications.

Response 18-40

Cost estimates were calculated using the latest industry-standard techniques and figures. The MUNI Metro Turnback facility is not a good comparison since it is a much wider and more complex facility than a double-track subway tunnel. Also, the Turnback facility was constructed in an area where soil condition was much less favorable than it is in the area of the Central Subway.

Response 18-41

See Response 18-29.

Response 18-42

The bridges open an average of less than two times per day for only three to five minutes, and will not have a significant impact on transit reliability (page 2-30, fourth paragraph of the DEIS/DEIR).

Response 18-43

According to FTA guidelines, travel time is a significant factor in determining mode choice and, therefore, potential ridership for each of the alternatives. Table 8-1 on page 8-3 identifies this performance measure as a primary FTA criterion for evaluating project alternatives.

Response 18-44

Travel time calculations are developed to compare the service on the line or lines that would change as a result of project implementation. In the case of the Third Street Corridor, the existing 15-line would be bolstered with added capacity to meet 2015 demand (No Build/TSM Alternative) or replaced with the Light Rail Alternative. In accordance with FTA guidelines, the differences in travel times are used to evaluate alternatives, as presented in the Evaluation of Alternatives (Chapter 8.0).

Response 18-45

Travel times for the mixed-flow option would be approximately 90-120 seconds longer during peak periods than the times for the IOS and New Central Subway presented in Table 3-7 (page 3-33, fourth paragraph). During midday, evenings, and weekends, lesser delays are expected.

Response 18-46

On the first paragraph of page 5-5, the DEIS/DEIR states that light rail would provide improved transit access and highly visible public investment in the Corridor, which are elements that would support economic revitalization efforts, not cause it. Also it is inaccurate to state that light rail stations are just concrete bus stops in the middle of the street. These platforms will contain decorative canopies, street furniture and art elements. They will provide increased lighting to the surrounding neighborhood at night. Merchant complaints on Church and Taraval Streets were due to loss of curb parking caused by the installation of the key stop platforms. In the Third Street commercial core, the mixed-flow lane configuration would enhance the streetscape design (as illustrated in Figure 5-4) without affecting curb parking.

Response 18-47

The issues of service inadequacies in the Third Street Corridor are discussed on page 1-3 of the DEIS/DEIR.

Response 18-48

The second paragraph of page 5-12 states that the light rail line would allow residents of the Corridor to ride a more convenient transit service to jobs in Mission Bay and the South of Market.

Response 18-49

On page 1-3 second paragraph and in Table 1-3, the DEIS/DEIR indicates that the Project's economic development goals, which relate to improved business conditions, not "image," are of equal importance to the transportation goals.

Response 18-50

See Response 18-49.

Response 18-51

As indicated in the first three paragraphs of page 2-39 and Table 3-7 on page 3-31, bus service between Visitacion Valley and Chinatown (via the 9X-San Bruno Expresses) will be maintained and, possibly, improved by the IOS. The New Central Subway would reduce travel time between Visitacion Valley and Chinatown by providing a direct link between the two communities and offering exclusive rights-of-way for transit along most of the alignment between Visitacion Valley and Chinatown.

Response 18-52

The light rail line may result in an overall increase in energy consumption as compared to the No Build/TSM Alternative, but there would be a shift from fossil-fuel based autos and diesel buses to electric-powered light rail using electricity generated by Hetch-Hetchy. (See *Evaluation of Alternatives Report*, page 3-12.)

Response 18-53

See Response 8-17.

Response 18-54, 18-55

The quantity of degreasers, lubricants, cleaning solutions, solvents, etc. is not at issue. The type of lubricants, storage, handling and disposal methods are identified as part of the plans required under EPA guidelines and State and City law and ordinances as indicated on page 5-63. These laws and ordinances have been promulgated to prevent the release of these materials into the environment.

Response 18-56

See Response 18-7.

Response 18-57

See Responses 18-8, 18-9, 18-10, and 18-21

Response 18-58

See Response 18-12.

Response 18-59

See Response 18-28.

Response 18-60

These ratings are necessarily qualitative and are based on best judgement. As indicated in Table 8-2 on page 8-3, Value of Travel Time Savings is an evaluation criterion used by FTA. The value of the 4-6 minute travel time savings offered by the IOS is translated over a period of time into substantial savings for all 15-line riders, particularly by 2015 when traffic congestion along Third Street is expected to degrade bus operating times.

Response 18-61

9X express bus service would be continued in the IOS and, for Bus Plan B (see page 2-39), would have expanded weekday and weekend service. When the New Central Subway is completed, light rail will provide a shorter travel time between Visitacion Valley and Chinatown than does the 9X.

Response 18-62

See Response 18-8.

Response 18-63

See Response 18-17.

Response 18-64

See Response 18-29.

Response 18-65

See Response 18-19.

Response 18-66

See Response18-21.

Response 18-67

Comparing Figure 2-2 (page 2-9) with Figure 2-4 (page 2-16) indicates that the 15-line in the No Project and No Build/TSM Alternatives passes within one block of the new Giants ballpark. The IOS would stop in front of the ballpark at the King/Second station stop.

The fourth sentence of the last paragraph on page 8-10 is revised to read:

> "In addition~~, it would not directly serve~~ **the 15-line would be one block removed from** the new Giants ballpark.

Response 18-68

See Response 18-60.

Response 18-69

The IOS does not serve Chinatown. Patrons wishing to travel between Visitacion Valley and Chinatown would use the 9X or an expanded service on the 9 (see Bus Plan A and B (page 2-38).

Response 18-70

Table 8-13 (page 8-11) indicates that the No Build/TSM Alternative has a more favorable rating than the IOS for the criterion "Parking Supply Along Third Street in the Commercial Core." However, the City of San Francisco maintains a "Transit First" policy, which indicates that transit investments and transit operations should take precedence over the use of cars.

Response 18-71

The figure of $30.60 per new rider (page 8-8) for the IOS is correct. This figure is calculated using revised FTA guidelines which do not take into account the value of travel time saved. The figure of $9.96 on page 8-12 is calculated using the old FTA guidelines, which do take into account value of travel time saved. This is noted in footnote 1 in Table 8-13.

Response 18-72

See Response 18-60. The current travel time on the 15-line between Third/Palou and Market Street is 30 minutes, not 44 minutes. Using FTA criteria, the annualized value of travel time savings of 4 to 6 minutes per trip is substantial.

Response 18-73

The entire two-phase project is expected to cost $1.3 billion in year of construction (escalated) dollars Table 7-18 . Of this amount, the City expects to ask the federal government to contribute $656 million or 50%. This is well within the normal percentage for federal share.

#19

April 8, 1998 File No.: 98-SF-20E

re: Third Street Light Rail Project; Case file 96.281E

Dear Staff:

Our office has no additional comment on the above referenced document. However, thank you for your continued concern for protecting historical resources. 19.1

Sincerely,

Leigh Jordan
Coordinator, NWIC

Comment Letter 19

Leigh Jordan
Northwest Information Center

Response 19-1

Comment noted. Office has no comments.

#20

RECEIVED

MAY 0 8 [illegible]

CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Dear Ms. Gitelman, 5/5/98

Re: Third St. Light Rail Project

We are writing in order to express our strong desire for a light rail extension down Third St. Such an extension would be an invaluable asset to the City and its residents. We encourage the Planning Dept. to do everything in its power to bring this project to fruition. 20.1

Sincerely Yours,

Christine A. Beard

David M Goldblatt

1318 10th Ave

Hemp paper saves trees

Comment Letter 20

Christine H. Beard
David M. Goldblatt
1818 10th Avenue
San Francisco, CA

Response 20-1

Comment noted. Strong desire expressed for light rail along Third Street.

Comment Letter 20

Christine H. Beard
David M. Goldblatt
1818 10th Avenue
San Francisco, CA

Response 20-1

Comment noted. Strong desire expressed for light rail along Third Street.

Timothy Wells
1025 Powell Street, No. 24
San Francisco, CA 94108
415/677-8957

May 5, 1998

#21

[illegible]
MAY 0 [illegible]
[illegible]

San Francisco Planning
Department
1660 Mission Street
San Francisco, CA 94103
ATTN: Hillary E. Gitelman
Enviromental Review Officer

Dear Hillary,

In response to the Third Street Light Rail mailer I received, I would like to express my opinion for the record.

Decision 1:
  Option 3: Maintain exclusive right-of-way for light rail with one narrow traffic lane in each direction. Allows bike lane. 21.1

Decision 2:
  Option 2: Low/Hybrid Platforms. 21.2

Decision 3:
  Option 1: Use the Fourth Street Bridge for the northbound and southbound travel. 21.3

Decision 4:
  Option 1: Former Western Pacific Rail yard site-westerly side. 21.4

The above are my preferred options to the various alternatives presented in the mailer. Please accept my comments in lieu of my attendance at the May 7,1998 Public meeting.

Sincerely,

Comment Letter 21

Timothy Wells
1025 Powell Street, #24
San Francisco, CA 94108

Responses 21-1, 21-2, 21-3, and 21-4

Comments noted. Preference expressed for exclusive light rail right-of-way, low/hybrid platforms, the exclusive use of the Fourth Street bridge for crossing Mission Creek, and the Western Pacific yard site.

QUARTET CREATIVE SERVICES

QUARTET CREATIVE SERVICES, INC.

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RECEIVED
MAY 08 1998
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

#22

6 May 1998

Hillary E. Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco CA 94103

RE: Third Street Light Rail DEIS/DEIR

Dear Ms. Gitelman;

We recently received a copy of Third Street Light Rail Connection. As a result, I would like to take this opportunity to respond to the various decisions and their options.

First, I am writing as one of the owners of a small, flourishing film and video production company located in the Potrero Hill flats. We relocated here from the Mission District several years ago for many reasons, two of which were adequate street parking and easy access along Third street and the Embarcadero to clients and facilities downtown. The Giants ball park will change both of those benefits for us. In fact, the loft boom and the move of several large companies/schools into our area without additional parking facilities has already negatively affected us. As a result, we are **strongly in support** of any effective public transportation systems that will take pressure off the Third Street corridor and potential remove parked cars on the street. 22-1

Decision 1. How should Third Street be redesigned for light rail in the Bayview Commercial Core? **We support Option 1.** It is the safest alternative. 22-2

Decision 2. What type of platform should be used in the Third Street Light Rail Line? **We support Option 2.** Low & Hybrid platforms make the most sense, regardless of cost. 22-3

Decision 3. How should the light rail line cross Mission Creek? **We support Option 1.** Use the 4th Street bridge for both directions and avoid the congestion that **already** exists at 3rd and Berry. 22-4

Decision 4. Where should the new Metro East light rail maintenance facility be located? **We support Option 1.** This choice is an obvious no- 22-5 brainer, the westerly side of the former WP rail yard site is the most logical, convenient, safest and least expensive.

Finally, we believe that the entire line should be put in immediately, all the way to Little Hollywood. This is a mode of transportation in a most deserving part of town that should have been in place decades ago. Third Street is dangerous for pedestrians who live and work in the area. This light rail system can only help the neighborhood. And, it effectively opens the Bayview commercial core to an influx of trade from downtown and vice versa. Its good for the City. Put the **entire** system in place as quickly as possible. 22-

Sincerely,

Jonna Ramey
Vice President

Comment Letter 22

Jonna Ramey, Vice President
Quartet Creative Services, Inc.
10 Arkansas Street
San Francisco, CA 94107

Responses 22-1, 22-2, 22-3, 22-4, and 22-5

Comments noted. Same preferences expressed as above (Response 21-1).

Response 22-6

Comments noted. Expressed preference to expedite construction of light rail line to Little Hollywood.

RECEIVED
[illegible] 9 1998
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

1661 Palou Ave.
San Francisco, Calif. 94124
May 5,1998

#23

Planning Commission
% War Memorial Veterans Building
401 Van Ness Avenue
San Francisco, Ca.

RE: The Third Street Light Rail Project

Dear Commissioners:

My name is Dorris Vincent. I have lived in the Bayview Hunters Point Community for thirty eight years. I am a member of several Community Organizations along with being a member of the Third Street Light Rail Community Advisory Group.

After attending many Light Rail Meetings the Community has made it VERY CLEAR that they want option B (mixed-flow) with low platforms "They have said don't come up with any other options." I personal agree with them ! 23-1

We know that is slower but we see that as a PLUS cars can't fly down Third Street as if they are on the freeway!!! And we believe that people will have time to see the Business's and come off the train/Cars and shop causing the revitalization of our Community. 23-2

I know you will listern to us approve the light rail for the Bayview Area Mixed Flow with the Low Platforms is what we all expect !!!

Thanks very much for your time.

Yours truly
Dorris M. Vincent
Dorris M. Vincent

Comment Letter 23

Dorris Vincent
1661 Palau Ave.
San Francisco, CA 94124

Responses 23-1 and 23-2

Comments noted. Expressed preference for mixed-flow option with low platforms.

D. Public Hearing Responses

SAN FRANCISCO PLANNING COMMISSION
REGULAR MEETING

---o0o---

PUBLIC HEARING
ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT/
ENVIRONMENTAL IMPACT REPORT
FOR THE
SAN FRANCISCO MUNICIPAL RAILWAY
THIRD STREET LIGHT RAIL

REPORTER'S TRANSCRIPT OF HEARING
THURSDAY, MAY 7, 1998
2:15 P.M.

APPEARANCES

VICE-PRESIDENT:

HECTOR CHINCHILLA

COMMISSIONERS:

DENNIS ANTENORE

CYNTHIA JOE

ANITA THEOHARIS

RICHARD M. HILLS

ZONING ADMINISTRATOR:

ROBERT W. PASSMORE

DIRECTOR OF PLANNING:

GERALD G. GREEN

COMMISSION SECRETARY:

LINDA D. AVERY

TAKEN AT:

401 Van Ness Avenue

San Francisco, California

PROCEEDINGS

MR. GREEN: This is the hearing on the Draft EIR/EIS for the Third Street Light Rail Project.

The purpose of this hearing is to gather input, public input on the Draft EIR/EIS which the Planning Department has prepared in partnership with the Federal Transit Administration, other City departments, and technical consultants.

All the comments that are received today from the public or from members of the Commission are to be transcribed and will be responded to in writing in the final EIR/EIS.

Written comments will also be received and may be submitted to the Planning Department, the Environmental Review Officer of the department, until the close of business on May 19th. It should be noted that written and oral comments will be treated equally and will be responded to in the final EIR/EIS.

Before we begin public testimony, I've asked Emilio Cruz, the Director of Muni, to provide a little context or some background regarding the project and to discuss the objectives and the issues that remain to be resolved.

It should also be noted that Emilio has set up a Policy Steering Committee, which I serve on.

Emilio has also set up a Technical Advisory Committee, which members of the Planning Department also participate in.

Emilio has provided us with ample opportunities to express our opinions and to provide a planning perspective at all phases of this project. And I am under the impression that we will continue to be allowed to do so as a preferred alternative is selected and the EIR is finalized.

I'm sure the Commission is aware that the Third Street Light Rail Project is a very important and vital transportation improvement for a very vital and important corridor of the City. It is along the Third Street Corridor that the Department expects to see major new development within the next 10 to 20 years.

As an example, the Giants ballpark, the Mission Bay Project, the University of California campus at Mission Bay, Moscone Center expansion, the Trans Bay area, and the Hunters

Point Bayview revitalization, as well as the shipyard revitalization, and, of course, the development at Candlestick Point.

All of these are projects which will benefit the Third Street Project and it should be noted that the Third Street Project will also benefit from those developments.

Having said that, I would like to now ask Emilio to come forward for a quick briefing, and then we should move on to the public comment.

I am sure that Emilio and I would certainly like to entertain questions, but I would like to remind you that the purpose of this hearing is simply to take input from the public and not necessarily to get into a discussion about the issues that remain outstanding.

Emilio.

COMMISSIONER CHINCHILLA: Director Cruz, welcome.

MR. CRUZ: Thank you, Mr. President, members of the Commission. My name is Emilio Cruz, Director of Public Transportation for the City and County of San Francisco.

We have before you a very exciting project that we are moving along on and, as the

Director has indicated, is at the final environmental draft form.

This project originated as the result of the Loma Prieta -- post-Loma Prieta earthquake property sales tax. And the City decided that they wanted to expand the rail corridors. We looked at a couple primary corridors and Third Street was identified, so we moved forward with that.

Third Street is an important corridor for the City. There are a lot of opportunities, both from the transportation perspective, as well as economic development. And it is critical that we do go all the way down at least to the Bayshore Station. That allows us the kind of activity to help transportation, makes our system more regionally interactive, and allows for better expansion in the future.

There is consideration as to what would happen if we went further down into Candlestick Point, if there was some development there, that would present the need for extended transportation. That is always an option.

The way this environmental document is written, we end at the Bayshore Station. But we could possibly amend the document and extend the project beyond Bayshore Station into Candlestick Point, if the need were to arise in the future.

Alternately, another project could be developed to do that. So nothing that we are doing would preclude us from extending past Bayshore Station at any time in the future.

What I would like to do today -- and just for our information, there is the Third Street Rail Project Corridor map, is there hopefully visible to people, again, going from the extension of the Embarcadero Project all the way down to the Bayshore Corridor.

Our IOS, or Initial Operating Segment, would involve extending the tracks, which today end at 6th and King Street, across the channel, down through the Bayshore Corridor all the way to the Bayshore -- I'm sorry, the Third Street Corridor to the Bayshore Station.

That, we believe, we could complete by the end of the year 2003, and would involve not only the capital infrastructure there, but also the purchase of about 25 brand-new light rail vehicles.

That's why, as part of the project, we envision building a new light rail facility in the area, either on Cargo Way or at what we refer to as the Western Pacific site. Not only will that facility house the 25 new vehicles, but we will take vehicles out of our Green Division, which right now is running overcapacity, move them over to this facility, and we will be able to further improve our preventive maintenance program.

Our second phase, or Phase II, would involve a new Central Subway. And if you see on that map, when you come north of the channel, the lines become dotted lines. At the point they are dotted is when we are actually underground.

What we hope in the future to be able to do is extend underground all the way into the Chinatown/Union Square area connecting somehow with the current Market Street subway.

The Phase II will involve not only that additional construction but purchase of some more light rail vehicles and further work on the Metro East facility.

We believe that the current facility -- the current document as Phase I has four primary areas that are still very open to public consideration. We are very interested to hear the public comments that you receive today.

Obviously, we have three alternatives:

A Build alternative; a No Build alternative, which would use simply transportation improvement, which would be basically improving a bus system along Third Street; and the required No Build alternative or No Project. Those are the three primary alternatives before you.

Within the Build alternative, there are four primary options that are still being considered. Those are what the lane configuration -- primarily in the Bayview Commercial Core, which is about a nine-block core area.

I will say that with regard to the Policy Steering Committee that we have, we have involvement from many City departments. Director Green represents you on that Policy Steering Committee. We also have the Redevelopment Agency, Parking and Traffic, Public Works, the Transportation Authority, a funding agency, Department of Real Estate, the P.U.C., the Arts Commission, and the Mayor's Office, to make sure that we are not only coordinating the transportation issues, but the economic development issues.

With regard to the Bayshore Core, the

lane configuration basically involves whether we should have an exclusive right-of-way, a shared lane; and if it's a shared lane, to what extent, how many blocks would the shared lane be.

We believe that any of those alternatives are viable. Obviously, an exclusive right-of-way gives us, as the transportation perspective, the most flexibility and the best operating system.

But recognizing that we are going into somebody's neighborhood and there are other elements, other needs; there is the need for pedestrian access, there's the need for economic development, there's the need for loading for the businesses in that area, it is likely that we would wind up with a mixed use. And the exact design of that mixed use is outlined in the environmental document.

We believe that as far as performance criteria, we will have -- if we go with No Build alternative, we'll be limited to about 135,000 passengers a day that we expect by the year 2015.

If we go ahead and build the rail alternative, the better service would probably cause an increase of about 2,500 to 3,000 passengers a day. Ultimately, if we got to Phase II, we believe we would get up to 142,000 passengers a day. So as you see, each one of these alternatives creates more passenger use.

The reason why we anticipate that growth is because of the decreases in travel time. If we leave it alone, obviously there's no decrease in travel time. If we build a light rail system, we'll decrease travel times by 6 to 11 minutes, depending on the point of origin along Third Street. And if we go all the way to the subway, we'll decrease it by 11 to 15 minutes. So by making public transportation more attractive, we do draw more people to it.

Schedule reliability is something that we will be looking at. And as I said, connection to other facilities is important for us. So we do want to make sure we are connecting at the Bayshore Station as well as at the terminal for Caltrain at Fourth and Townsend.

With regard to the second major alternative that we are looking at is the type of platform that we will be using. Today we operate high-level platforms in the subway and also on the Embarcadero, if any of you have had an opportunity to ride the E-Line, you see a center-loading, high-level platform. It is a very good design for us. It provides the best accessibility for all of our patrons, whatever their mobility conditions might be.

We also do have, obviously, low-level loading out in the Avenues, prior to modifications, back when the system basically picked up literally right in the middle of the street.

We also have a third element now that we are using, which is what we refer to as our "key stops," where we have modified low-level platforms and added a high-level ramp, so that a passenger who is in a wheelchair can go up the ramp.

It necessitates the trains make two stops; the first stop at a high level to pick up the passengers in a wheelchair, the second stop at a low-level to pick up any remaining passengers. So we have the flexibility to do all of them.

What we are considering at this point is that center-loading platform, which works very well on the Embarcadero, could also be used very effectively on Third Street. There is the option of low-level hybrid. And what the community has been looking at is alternatives whereby center-loading platforms will be high, side-loading platforms will be low.

One of the real concerns that comes up always is, when people hear about a 33-inch high platform, they think it's a barrier, both physical as well as visual. What we have done, and these are fresh off the print, is taken a photograph -- and we will leave these here for the remainder of the meeting -- of Third Street and then what would happen if we built the center-loading, 33-inch platform on Third Street. And you can see that there is virtually no impact to the passengers from one side of the street looking over to the other side.

We had a similar issue on the Embarcadero, a concern, which everybody could experience right when they walked out of the building. We took some shots across Van Ness Avenue. And if you are standing on the sidewalk of Van Ness Avenue and you're looking across the street, the ground level of the median on Van Ness Avenue is 30 inches higher than where you're standing on the sidewalk.

So it gives you a perspective as to what a 33-inch platform will do in the center of a roadway. Van Ness Avenue is 30 inches higher in the middle than it is at the sidewalk level.

So that is one of the major alternatives that needs to be considered in the document that, again, we are anxious to hear the public comment on.

The third primary issue is where the rail should cross Mission Creek. There is two alternatives in the document; one is a two-way couplet, using Third Street in a northbound direction, Fourth Street in the southbound direction. The other alternative is to put both directions on the Fourth Street Bridge itself.

The advantages of putting -- separating them is that northbound light rail has an exclusive -- a lane on Third Street. So on the Third Street Bridge itself, we do get an exclusive right-of-way. And it's slightly easier to connect to the Central Subway for Phase II.

The disadvantages are that the light rail service may be disrupted during high use of Third Street, especially during the game days when there might be a lot of traffic coming up Third Street. The sooner we got off onto Fourth Street, that would be better for us, and we would still be only a block away from the ballpark.

The King Street intersection becomes very congested, and it varies. So, again, automobile congestion might impact our ability to stay on time. And then there's a poor northbound connection to Caltrain because Caltrain is down at Fourth Street.

The advantages of staying both on Fourth Street are that we get that better connection to Caltrain and that's going to reduce construction costs by about $2 million, by not having to retrofit Third Street Bridge.

The disadvantages of Fourth Street alone are that the northbound and southbound light rail must operate a shared lane with automobile traffic. So, considering the traffic on Fourth Street, it may or may not be a disadvantage. And northbound riders have a slightly longer travel time by taking that diversion off of Third Street and Fourth to ultimately get to the same connection point.

Finally, the fourth decision that we believe is critical is the location of Metro East. Both of the pieces of property that we are looking at are Port-owned property and Port-managed property. One of them is Cargo Way, which is -- if you can see, the site a little further south, and then Western Pacific, just the other side of the channel.

The Cargo Way site was the original site identified. The major advantage of it is that it's cheaper and it's easier to get our hands on. But, like they say, you get what you pay for. The reason why it's cheaper is that it has significant -- significantly poor geotechnical conditions, it has hazardous waste issues, and so it becomes more difficult to build on.

In addition to that, the site is not rectangular; therefore, it creates some design alternatives that need to be put into the Metro East facility.

Western Pacific site, we could either use the eastern side of Western Pacific or the western side of Western Pacific, and we really are leaving that option open to the Port. In either one of those, the alternative could be a rectangular-designed building, better design for us; disadvantage is that it's slightly more expensive in price.

The overall project is in the

neighborhood of $400 million for the track construction and the Metro East facility. And, as I said earlier, our target for Phase I completion is the year 2003 operation.

Phase II is still a little in the air because it will rely on funding. This document will allow us to pursue federal funding in the near -- in the future for Phase II, even though we plan on using all local funding for Phase I through the Transportation Authority.

Thank you.

COMMISSIONER CHINCHILLA: Thank you.

MR. GREEN: Well, again, our staff of Muni, as well as Hillary Gitelman, stand ready for any questions you have, but I suggest we get right into the public comment.

COMMISSIONER CHINCHILLA: All right. Why don't we do that then.

The first speaker card I have is Pauleen Peele.

D-1

MS. PEELE: Thank you, Commissioners. I'm a resident of Bayview Hunters Point. I worked for years on the South Bayshore Plan with Peter LaBree, Cheryl Townsend.

One of the things that we went for

D.1

support on was extending the light rail past their point, past Mission Bay, which at the time was the plan. So I've been supportive of this for a very long time.

I'm here also to speak for Southeast Alliance for Environmental Justice, Claude Wilson, the president, couldn't be here, and also for the New -- Merchants, which is the district council for -- because the president couldn't be here.

But we are all in strong agreement. We support the Build, but only on the condition that it includes the mixed flow. We are adamantly -- as opposed to residents -- as a part of speaking to residents, adamantly opposed to the dedicated line because of the impact it would have on the beautification, because of the bike lane, because of the pedestrian situation.

And, as I say, we would go all the way to the No Build were we not able to get the mixed flow.

Thank you for your time.

COMMISSIONER CHINCHILLA: Paul Gloss. D.2

MR. GLOSS: Thank you, Commissioners.

I'm also a resident of the Bayview. I am a Representative for Roses, which is a group of the community. We have been active out there for a long time. We are very excited and we very much want this project to go forward, but, again, we want the mixed flow.

D.2

Basically, we must have wider sidewalks. The sidewalks are very narrow now, they are only 10 feet, and the mixed flow is the only viable option which would increase those sidewalks a little bit. It's only two feet, but we need it.

The people must come first here, and it's that sidewalk. We want to revitalize the business in that area, and that little bit of sidewalk means a tremendous amount to us.

The mixed flow also gives us much better parking for our merchants, which the other plans would take a lot away. It gives a better plan for beautification with this. The wider meridian looks like we could even have our own set of palm trees.

We need to make that -- at least that nine-block section, the center of Bayview, a very beautiful place. That has got to be important. It's got to be a place where the City can be proud of. We are only talking about a nine-block area, we need that mixed flow.

It also gives us more left turns, which we need when we live up there. Third Street is very critical. It's the only possible artery out there, so we can't substitute it.

Thank you very much.

COMMISSIONER CHINCHILLA: Sophie Maxwell.

D.3

MS. MAXWELL: Good afternoon. My name is Sophie Maxwell, and I am chairman of the Bayview Hunters Point PAC. And, as you know, we are going through a survey and we are determining whether or not we are going to be part of a redevelopment area. And I think I've said all this before, you all look so familiar.

But at any rate, we have looked at every single aspect of Bayview Hunters Point; we are looking at transportation, we are looking at our air, our power, our housing, everything. And when we came to this, I must say that Muni has left no stone unturned to make sure that there is public participation.

And from this, the public has overwhelmingly said that they wanted mixed flow. And for all the other reasons that everybody has stated here, those are the same reasons; because of

D-3

the economic development, because of the beautification, because of -- what were some of the other ones, Pauleen? -- right, the sidewalk, and all those great things.

We are looking for Bayview Hunters Point to be a part of San Francisco in every respect; to look like it, to feel like it, to have the openness, the friendliness. And so we need those kind of things.

We also do not want rapid transit down the middle of Third Street. It just does not work. We are looking at trying to have an area where people feel comfortable in walking, where your children don't have to look twice before -- I mean, they can look twice, but you are not afraid that they are going to get run over by a streetcar. So I think it's very important.

And we are thinking 9 blocks, where we really need 12 blocks of commercial area. And we certainly -- so in looking at that, we certainly don't need less, we need more, if anything.

Thank you for your consideration, and I know you are going to do the right thing. Thank you.

COMMISSIONER CHINCHILLA: Ena Aguirre. D-4

D.4

MS. AGUIRRE: Good afternoon, Commissioners. My name is Ena Aguirre, and I live in Bayview Hunters Point. I agree with all the statements that have been made before that, you know -- but my concern really is that a lot of -- I mean, I, for one, find it difficult to go through this whole, you know, book.

And I don't know what I'm missing. I mean, I really -- I'm used to going to other meetings where -- about the shipyard, where the experts are -- you know, they all got up, and from listening to them, I was able to understand what might be some of the negative stuff.

In here, I feel kind of lost. I mean, I don't know. Maybe there is something in here that I -- you know, I did read it, but it really didn't mean too much to me really, to tell you the truth.

And so, I mean, I'm just hoping that we are doing the right thing. And I'm hoping that we are doing the right thing for the residents of Bayview Hunters Point. And I'm hoping that we are doing the right thing for the City and County of San Francisco.

And, you know, I -- one of my concerns

personally was just, you know, the left turns. I was concerned that all of those things that's in there are taken care of.

So thank you very much for taking the time to listen to us. Thank you.

COMMISSIONER CHINCHILLA: I have no other speaker cards. Any other member of the public care to address the Commission at this time?

All right, if not, we will entertain comments from the Commissioners.

And let me jump in. Just a couple of concerns that I have. D.5

First and foremost is, I guess, the conclusion that the draft report draws, that there is no way to mitigate, you know, the one lane in the core or corridor. And that troubles me for a couple of reasons.

As you all know, the Third Street Corridor is vital, and it's a very sensitive area. And I think that transit, as welcome as it is in the area, can have a negative impact if not carefully monitored.

We should learn from the lessons that we have had before us, for example, the Key Stops. The Key Stops in San Francisco, you know, great,

D.5

great -- provide accessibility to the riders, but, depending on where they are at, they either have been good for the area or destroyed an area.

Let me give you a comparison: The 29th and Church Street, you know, there was a lot of neighborhood opposition to that, but Muni and Planning went out of their way to sort of mitigate as much as possible the impact that the Key Stops would have on the local businesses. And they did that by realigning parking in the areas. And that commercial strip thrives today.

Ocean Avenue, on the other hand, was destroyed by a couple of Key Stops. It wiped out small businesses. And we should learn -- and it's very necessary to have these things, but we should learn from these experiences.

And I'm afraid that the report does not adequately address how we could mitigate those impacts, if the alternative is to do the right-of-way.

Also, I don't think that the document adequately indicates how Muni could -- or how the flow of traffic could be mitigated. For example, if they have this mixed flow concept go in, there has to be a way that the traffic will not impede

9.5

what we are trying to accomplish here. And what we are trying to accomplish is a transit system that is efficient.

I know Director Cruz at one point informally mentioned the exclusive lanes during commute hours, the diamond lanes. And, since I'm a driver in the City, I know they work pretty well. They keep me out of those lanes and Muni goes right through. And it's important to keep that. So I don't see that happening in the report, so that may need to be expanded on.

I also question the conclusion that is drawn in the draft document as it relates to economic feasibility. One of the conclusions it draws is that we are going to have a steady supply or an available supply of labor to get this done on budget and on time.

But I question the accuracy of that conclusion, in light of the reports that have been published in the press recently, saying that we have the benefit of going through a building boom. And we can't find labor. And this is not just a regional phenomenon, it's a national phenomenon. So I question that conclusion.

And I can't stress enough the

importance of the areas of controversy. This will make or break the area. So I'm sure that the people that are involved in, Mr. Green, that you'll pay special attention to that. Because the areas of remaining controversy are probably the most critical to the system itself.

Those are all my comments.

Commissioners, any other comments?

By the way, to Ms. Aguirre, I will say that maybe the reason you don't know what's missing is because nothing is.

MS. AGUIRRE: Thank you, very much, for telling me.

COMMISSIONER CHINCHILLA: Otherwise, it's a very comprehensive document.

Commissioners, any other questions?

Okay. With that, we will close the public hearing.

Staff, do you have anything else to add? Ms. Gitelman? Mr. Green?

We are accepting written comments?

MR. GREEN: Yes, again, up to the close of business, that would be 5:00 o'clock on May 19th. They can be delivered to the Planning Department, specifically to Ms. Hillary Gitelman, the Environmental Review Officer for the Department.

COMMISSIONER CHINCHILLA: Okay. That's good. Thank you.

---oOo---

(Whereupon, the proceedings concluded at 2:42.)

STATE OF CALIFORNIA

:

CITY AND COUNTY OF SAN FRANCISCO

I hereby certify that the proceedings in the foregoing transcript was taken down by me, in the within-entitled cause; that said transcript was taken at the time and place herein named; that the transcript is a true record of the proceedings as reported to the best of my ability, a duly licensed Certified Shorthand Reporter and a disinterested person, and was thereafter transcribed under my direction into typewriting by computer.

I further certify that I am not interested in the outcome of said action.

RACHEL FERRIER, CSR # 6948

D. PUBLIC HEARING RESPONSES

Response D-1 Ms. Pauline Peele

Comment noted. This resident of Bayview Hunters Point, and representative of the Southeast Alliance for Environmental Justice and the Bayview New Merchants Association, expressed support for the mixed-flow option for the Third Street commercial core to allow for street beautification, bicycle use and improved pedestrian space.

Response D–2 Mr. Paul Gloss

Comments noted. This resident of Bayview and representative of the community group "Roses", expressed support for the mixed-flow option to allow for improved sidewalks, retention of parking for merchants, and more left turns along the Third Street commercial core. A request for a nine-block area to be landscaped was also made in the comments. MUNI's urban design consultant is currently working with the communities along the light rail line to develop station design and landscaping concepts. Two Corridor-wide workshops took place this summer. Neighborhood workshops to refine and select the design concepts will be conducted in September and October.

Response D-3 Ms. Sophie Maxwell

Comments noted. This speaker is Chairman of the Bayview Hunters Point Policy Advisory Committee. MUNI was complimented on their public participation. Support for the mixed-flow option was expressed, stating that economic development related to street beautification and sidewalk space and an open, friendlier commercial area would be improved. A request for a 12-block area rather than a 9-block area was expressed. Throughout the public participation process, neighborhood residents and business representatives expressed the preference for the nine-block segment between Kirkwood and Thomas Avenues as the critical portion of the Third Street commercial core requiring special design treatments.

Response D-4 Ms. Ena Aguire

A concern about left turns was expressed. As the DEIS/DEIR describes on page 3-43, left turns would be retained in the mixed-flow option from all side streets. This mixed-flow option was selected by the Public Transportation Commission at their June 23, 1998, meeting as part of the Locally Preferred Alternative.

Response D-5 Commissioner Chincilla

As discussed on page 3-44 of the DEIS/DEIR, implementation of either of the Third Street commercial core one-lane options (Options 2 and 3) would result in severe traffic congestion in both directions of Third Street during peak as well as during non-peak periods. Since local traffic (as well as through traffic) demands are greater than the capacity offered by one traffic lane in each direction, no reasonable mitigation measures are available to maintain just one lane in each direction and still achieve acceptable and safe traffic operations within the commercial core.

The mixed flow option (Option 4), which was selected on June 23, 1998, by the San Francisco Public Transportation Commission as part of the Locally Preferred Alternative, would consist of two traffic lanes in each direction along Third Street, with each direction's inside lane shared by both automobiles and light rail vehicles. Under the mixed flow option, acceptable traffic operations would result during both peak (LOS D or better conditions would result during the a.m. peak hour and LOS C or better would result during the p.m. peak hour) and non-peak periods, although up to 90 seconds of extra travel time would be added to a light rail train's one-way travel time due to automobile interference. If the inside travel lanes were reserved exclusively for light rail vehicles during commuter hours (using treatments such as raised medians or diamond lanes), severe traffic congestion would occur similarly to that expected under either of the one-lane options, i.e., all of the study intersections would operate at unacceptable conditions (LOS E or F), bottlenecks would occur where the traffic lanes transition from two to one, substantial traffic diversion into the neighborhoods would result, slow-moving vehicle queues may block vehicles turning to or from side streets, and emergency response times would be significantly reduced (see page 3-44 of the DEIS/DEIR).

Regarding key transit stops and the potential impacts to on-street parking, it should be noted that the mixed-flow option would actually add about 15 new parking spaces, over existing conditions, in the Third Street commercial core, as discussed on page 3-59 of the DEIS/DEIR. The mixed-flow option, which maintains curb parking on Third Street, was chosen by the Public Transportation Commission because of the preference expressed at the public meetings by community representatives. To further enhance parking opportunities within the commercial core, the DEIS/DEIR recommends that before or during final design, MUNI, DPT, and the Redevelopment Agency jointly coordinate the development of a parking plan, including consideration of off-street parking (see page 3-61). In addition to parking, MUNI is working with the communities, including business representatives, to develop streetscape design concepts that can support the revitalization of local businesses and provide greater access to their stores/offices. As noted on page 3-60, over 70 additional parking spaces could be gained on close-in side streets by reconfiguring the existing parallel parking on the side of commercial businesses and institutional uses to perpendicular parking.

In addition to the public hearings on the DEIS/DEIR, MUNI has held over 120 community meetings to resolve these areas of controversy prior to the final design of the project.

E. Staff Initiated Changes

E. STAFF INITIATED CHANGES

On June 23, 1998, the Public Transportation Commission selected the following design options for the Light Rail Alternative:

- Mixed-flow option along the nine-block Third Street commercial core;
- High platforms for all light rail stations;
- Bi-directional crossing of Mission Creek on the Fourth Street bridge; and
- The western end of the Western Pacific site for a new LRV maintenance and storage facility.

As a result, Figures 2-4 and 2-5 on pages 2-16 and 2-17, respectively, are revised. Staff initiated revisions are described below.

E-1 Caltrain Bayshore Station Area

MUNI may include a smaller, surface parking lot instead of a parking structure in the Bayshore Station plan. The last paragraph on page 2-18 is revised.

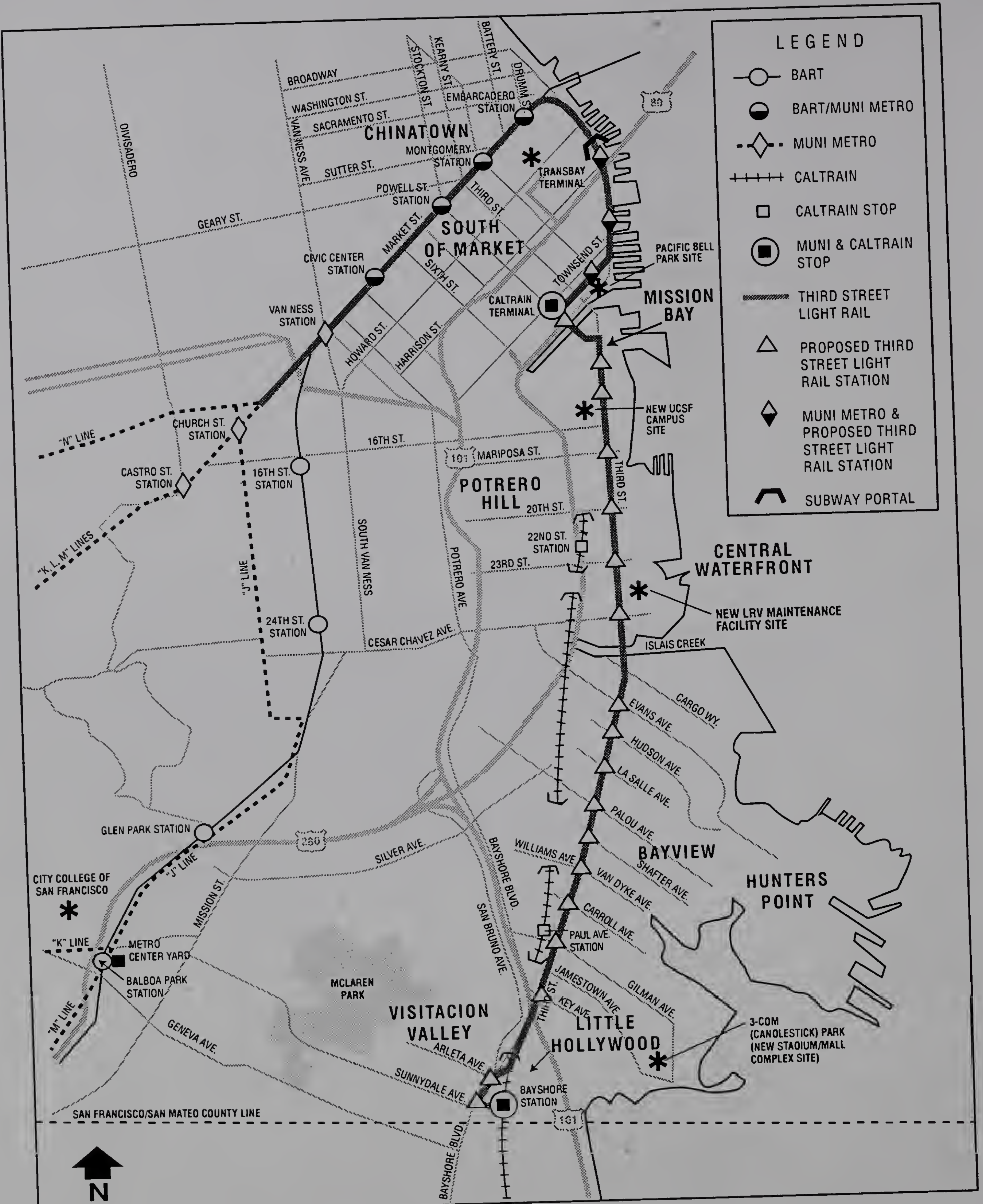
> The plan for the intermodal facility, indicated in **Figure 2-7**, incorporates two boarding tracks, a center boarding platform, eight bus bays for MUNI, SamTrans, and private shuttles, a curbside drop-off area, and, **if demand warrants**, a parking structure. Ticket vending machines, sheltered boarding areas, and other passenger amenities would be included. The one- or two-level parking structure would provide up to 285 spaces for light rail passengers and additional spaces for those displaced at the rear of the Pacific Lithograph facility. **Alternatively, MUNI may construct a 50-145 space surface parking lot, requiring fewer parcels and retaining the UPRR spur track, instead of the parking structure**. The station area would be designed to facilitate cross-platform transfers with a relocated Caltrain Terminal, which would move south a few hundred feet.

The privately-owned parcels that may be acquired for the station area contain two businesses, an animal trapper and a storage company. Consequently, Table 5-1 on page 5-8 is revised.

TABLE 5-1

ACQUISITION AND RELOCATION REQUIREMENTS
(Revised August 26, 1998)

LOCATION	REASON FOR ACQUISITION/SEGMENT	ACQUISITION	RELOCATION
North of County line between Bayshore Blvd. and Tunnel Avenue	Bayshore Station/IOS	several parcels containing a vacant industrial structure and abandoned maintenance-of-way sheds	~~No~~Two businesses with one to two employees



J96-082.14b Mc4

FIGURE 2-4

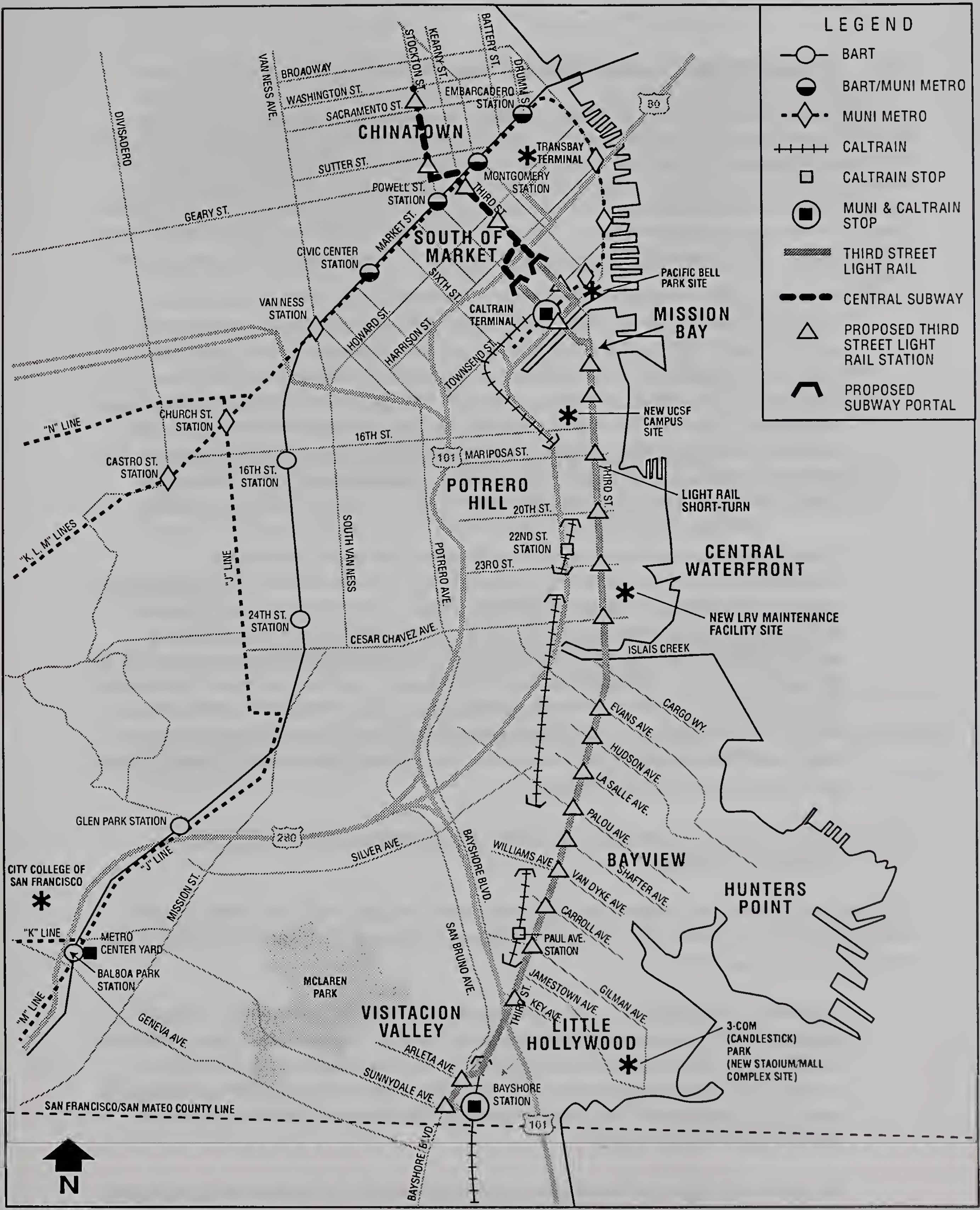
LIGHT RAIL ALTERNATIVE – INITIAL OPERATING SEGMENT

(via Market Street Subway and the MUNI Metro Extension)

Third Street Light Rail EIS/EIR

Source: ICF Kaiser Engineers, Inc.

(Revised 7/21/98)



J96-082.15b Mc4

FIGURE 2-5

LIGHT RAIL ALTERNATIVE – NEW CENTRAL SUBWAY

(via Third and Stockton)

Source: ICF Kaiser Engineers, Inc.

Third Street Light Rail EIS/EIR

(Revised 9/1/98)

E-2 Bayshore/Blanken Intersection Realignment

The Bayshore/Blanken intersection will be redesigned to accommodate a center high-platform immediately to the south of the intersection. This redesign will expedite traffic movements between Blanken and Arleta and Bayshore Boulevard by creating separate intersections for Blanken and Arleta with Bayshore Boulevard. Truck movements to Tunnel Avenue from Bayshore Boulevard will be rerouted to this intersection. This rerouting will require action by the Parking and Traffic Commission to allow truck movements on one block of Blanken between Bayshore Boulevard and Tunnel Avenue. The second and third paragraphs on page 2-21 and Figure 2-8 on page 2-22 are revised.

> At Bayshore Boulevard, the double-track alignment would curve north into the median of Bayshore Boulevard on a dedicated four- to six-inch raised trackway. A raised trackway, paved with textured concrete or cut stone paving blocks, would be accessible to emergency vehicles but would discourage vehicular traffic. Two lanes of the six-lane roadway would be dedicated to the light rail line. Intersections would be regraded to conform with the raised trackway **and a median strip in the middle of Bayshore would be retained**. The roadway width would allow parking to be retained throughout the length of Bayshore Boulevard except at the Sunnydale station.
>
> The light rail line would continue north on Bayshore Boulevard curving past Arleta/Blanken Avenues, ascending to the Highway 101 overcrossing. **To accommodate a station immediately south of the Bayshore/Blanken intersection and to facilitate traffic flow at this intersection, Blanken will be realigned. Pending engineering analysis, Blanken will intersect Bayshore in a "T" design immediately to the north of the current location.** North of Blanken, the alignment would be constructed on retained fill approximately 2 meters (6 feet) high for a distance of 215 meters (705 feet) to reduce the gradient from nine to seven percent (**Figure 2-8**). The retained fill would block left turns from Bayshore onto Tunnel Avenue and the southern end of Hester Avenue, diverting these movements to Blanken Avenue.

E-3 Highway 101 Overcrossing Area Light Rail Alignment, Station, and Traffic Circulation Revisions

The light rail alignment and traffic circulation in the area of the Highway 101 overcrossing is revised as follows (the fourth, fifth, and sixth paragraphs of page 2-21, Figure 2-8 on page 2-22, and Table 5-1 on page 5-8):

> Approaching the Highway 101 overcrossing, the light rail alignment would descend to grade and shift to the east side of the Bayshore Boulevard right-of-way. To accommodate this shift in the alignment, Bayshore Boulevard would be widened on the east and a retaining wall installed along the easterly slope near a motel and restaurant, requiring a 6-meter (19.5-foot) strip of City property bordering the Bayshore right-of-way near the northern end of Hester Avenue.
>
> The shift in the alignment would allow northbound vehicles on Bayshore to be segregated into Third Street-bound traffic and northbound Bayshore/Highway 101-bound traffic (refer to **Figure 2-8**). At the Bayshore/Hester intersection (north end), traffic from Hester could turn northbound toward Third Street or toward Bayshore Boulevard/Highway 101 on-

ramp. **Traffic reversing direction from Bayshore Boulevard southbound to northbound Third or the northbound Highway 101 on-ramp will have two left turn lanes to accommodate the volume of traffic anticipated in 2015. The additional left turn lane will require a 3.5-meter (11.4-foot) strip of Caltrans right-of-way to construct a retaining wall.** The complex turning movements at the Bayshore/Hester intersection in conjunction with light rail operation would be controlled by signalization. (See Chapter 3.0, Transportation Analysis)

After passing over Highway 101, the light rail alignment would descend onto Third Street in a retained cut which would reduce the steep nine percent grade to five to eight percent. The retained cut would be placed in the middle of Third Street 1.5 to 2.0 meters (6 to 8 feet) below street level and extend for 275 meters (900 feet), eliminating left turn movements between Third Street and Le Conte Avenue, Keith Street, and Key Avenue. Access to Third Street for residents living along Le Conte, Keith, and Key west of Third would be replaced by extending Keith ~~Avenue~~ northeast along the existing Caltrans right-of-way to the intersection of Third/Jamestown. **The proposed station location at Jamestown would be changed to Third between Le Conte and Key. The center high-platform would eliminate curb parking in this block. Pedestrian access across Third Street in this area would be provided at Jamestown and Key Avenues.**

TABLE 5-1

ACQUISITION AND RELOCATION REQUIREMENTS
(Revised August 26, 1998)

LOCATION	REASON FOR ACQUISITION/SEGMENT	ACQUISITION	RELOCATION
West side of Bayshore at Highway 101	**Line/IOS**	**Vacant public right-of-way**	**No**

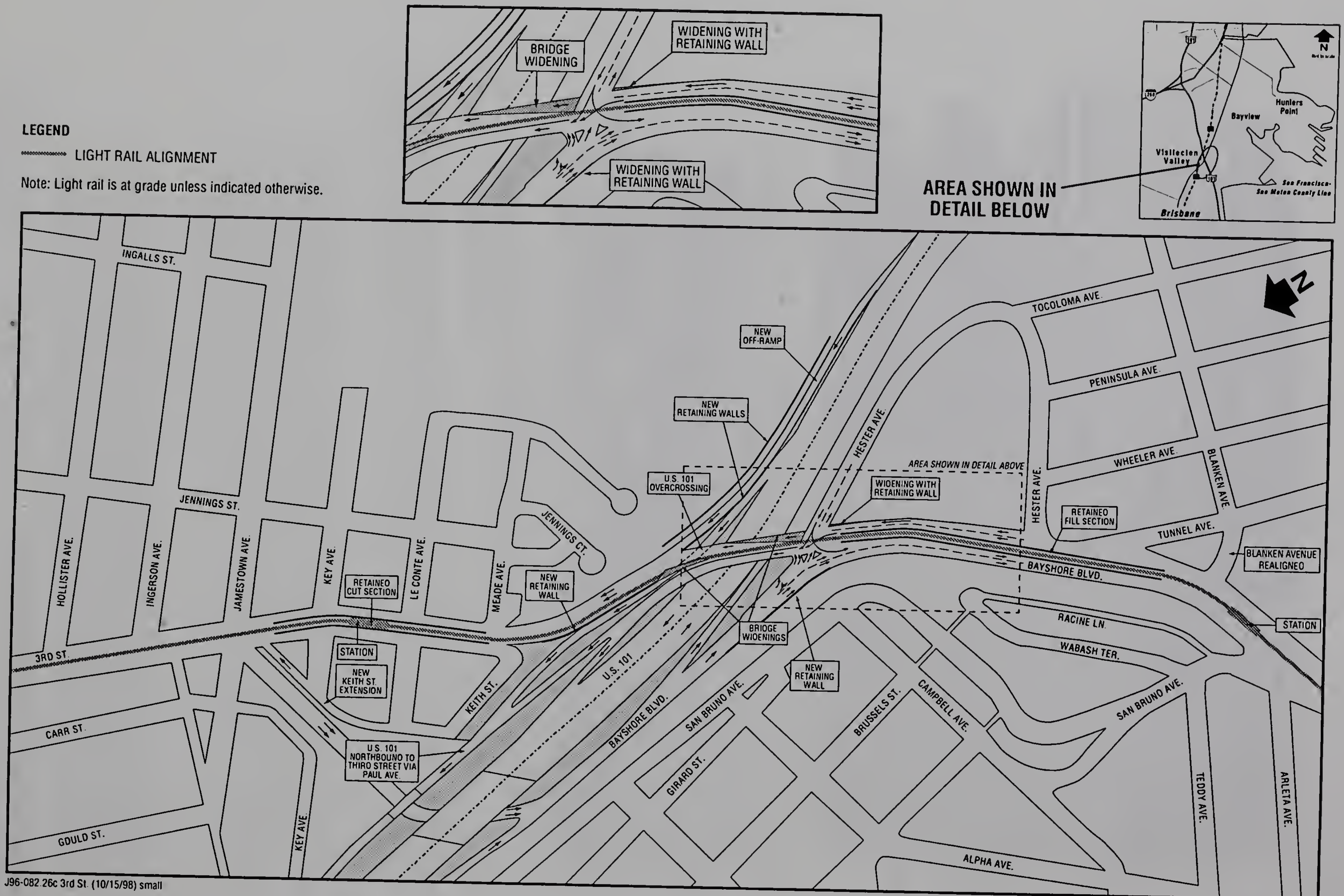


FIGURE 2-8

HIGHWAY 101 OVERCROSSING PLAN

Third Street Light Rail EIS/EIR

(Revised 10/15/98)

Source: ICF Kaiser Engineers, Inc.

E-4 Third/Jamestown Station Relocation

The proposed station at Third/Jamestown is changed to Third/Key. The first paragraph of page 2-23 and Figure 2-8 and Table 5-1 on page 5-8 are revised.

> …ramp, which would require a 244-meter (800-foot) long, nine-meter (30-foot) high retaining wall along Bayview Hill, would allow vehicular traffic to merge into the northbound traffic lanes on Third Street without crossing the light rail alignment. ~~Between Jamestown and Ingerson, a station located in that block would require a three-meter (10-foot) strip from a business parking area that borders the public right-of-way on the west.~~

TABLE 5-1

ACQUISITION AND RELOCATION REQUIREMENTS

(Revised July 21, 1998)

LOCATION	REASON FOR ACQUISITION/ SEGMENT	ACQUISITION	RELOCATION
~~Northwest corner Third Street and Jamestown Avenue~~	~~Station/IOS~~	~~Truck storage parking area for pest control business~~	~~No~~

E-5 Selection of the Mixed-Flow Option for the Third Street Commercial Core

On June 23, 1998, the Public Transportation Commission selected the mixed-flow option for the nine-block Third Street commercial core between Thomas and Kirkwood Avenues. The mixed-flow option requires an additional LRV because light rail would travel in the same lane with other vehicles along this segment, resulting in slower travel times than the dedicated-lane option. The second paragraph of page 2-23 is revised accordingly.

> The design of the light rail alignment and station locations in the nine-block Third Street commercial core between Thomas and Kirkwood Avenues is being coordinated with Redevelopment Agency-assisted community initiatives to revitalize the Bayview commercial district. As an alternative to the same alignment configuration in this nine-block segment as in the remainder of Third Street, the community elected to study four design options for Third Street containing varying lane, parking, sidewalk, and streetscape configurations. A mixed-flow option was included as one of the four design options because of community concern for retaining existing parking along Third Street. **On June 23, 1998, the PTC selected the mixed-flow option as the preferred design for the nine-block commercial core**. Models for two of the design options are presented in **Figure 2-9**.

Table 5-1 on page 5-8 is also revised to indicate that if the triangular parcel on the southeast corner of Third/Oakdale is acquired, one business would be displaced.

TABLE 5-1

ACQUISITION AND RELOCATION REQUIREMENTS
(Revised August 23, 1998)

LOCATION	REASON FOR ACQUISITION/SEGMENT	ACQUISITION	RELOCATION
Southeast corner Third Street and Oakdale Avenue	Station/IOS	small vacant commercial building	~~No~~ **Yes, one business**

The fourth and fifth paragraphs of page 2-39 which describe the IOS light rail vehicle requirements incorporating the mixed-flow option are revised.

> A summary of the operating statistics for the Light Rail Alternative – IOS is presented in **Table 2-6**. Compared with the existing fleet, the table indicates that the IOS, **operating in mixed-flow conditions along the nine-block Third Street commercial core**, would require an additional ~~25~~ **26** LRVs (including spares) to meet 2015 peak demand for the MUNI Metro system, including extension of the J-line along Third Street. To meet peak service requirements in 2003, the implementation year for the IOS, ~~15 of 25~~ **16 of the 26** LRVs would be needed.
>
> To meet 2015 demand, ~~25~~ **26** new LRVs would be required, increasing MUNI's total fleet size, including spares, to ~~161, or 25~~ **162, or 26** more than for the No Project and No Build/TSM Alternatives. ~~If the mixed-flow option were selected for the Third Street commercial core, one additional LRV would be required due to the slightly slower travel times along this segment.~~

The fifth paragraph of page 2-57 and the second paragraph of page 2-58 which identify the New Central Subway light rail vehicle requirements incorporating the mixed-flow option are revised.

> A summary of operating statistics for New Central Subway is presented in **Table 2-8**. The table indicates that, compared with the IOS, the New Central Subway would require three additional peak period LRVs and one spare, primarily because of the additional route miles of the New Central Subway and the increased service frequencies. ~~In addition, in the mixed-flow option, one additional LRV would be required to compensate for the slower travel times through the Third Street commercial core.~~
>
> The Light Rail Alternative – New Central Subway would require three additional LRVs beyond the requirements for the IOS. In this scenario, MUNI's total LRV fleet size, including spares, would be ~~164~~ **165**.

Table 2-6 on page 2-40, Table 2-8 on page 2-58, and Table S-2 on page S-9, which present the IOS and New Central Subway operating statistics, are also revised.

TABLE 2-6

ANNUAL OPERATING STATISTICS FOR LIGHT RAIL ALTERNATIVE - INITIAL OPERATING SEGMENT

(Revised July 21, 1998)

Alternative	Peak Headways: 15 Line	Diesel/Trolley Peak Demand (Systemwide)	Total Annual Bus Hours (Systemwide)	Peak Headways: Third Street Light Rail	LRV Fleet Peak Demand (Systemwide)	Annual LRV Car-Hours (Systemwide)
Existing (1998) (No Project Alternative)	6 minutes	373 diesel buses/ 263 trolley buses	2.29 million	--	107 LRVs	395,600
No Build/TSM (2015)	5 minutes	400 diesel buses/ 269 trolley buses	2.40	--	107 LRVs	395,600
Light Rail Alternative - IOS (2015)	--	Plan A: 370 diesels/ 269 trolleys Plan B: 369 diesels/ 269 trolleys	Plan A: 2.26 million/ Plan B: 2.27 million	6 minutes	~~128~~ 129 LRVs~~(1)~~	~~467,200 (2)~~ **471,500(1)**

Notes: ~~(1) One additional LRV, adding 4,300 car-hours, would be required if the "mixed-flow" option were selected for the Third Street commercial core.~~

~~(2)~~(1) Assumes one-car trains in the peak and midday on the J-line, which would operate on Third Street.

TABLE 2-8

ANNUAL OPERATING STATISTICS FOR LIGHT RAIL ALTERNATIVE - NEW CENTRAL SUBWAY

(Revised July 21, 1998)

Alternative	**Peak Headways 15 Line**	**Diesel/Trolley Peak Demand (Systemwide)**	**Total Annual Diesel/Trolley Bus Hours (Systemwide)**	**Peak Headways: Third Street Light Rail**	**LRV Fleet Peak Demand (Systemwide)**	**Annual LRV Car-Hours (Systemwide)**
Existing (1998) (No Project Alternative)	6 minutes	373 diesel buses/ 263 trolley buses	2.29 million	--	107 LRVs	395,600
No Build TSM (2015)	5 minutes	400 diesel buses/ 269 trolley buses	2.40 million	--	107 LRVs	395,600
Light Rail Alternative – IOS (2015)	--	Plan A: 370 diesels/ 269 trolleys Plan B: 369 diesels/ 269 trolleys	Plan A: 2.26 million/ Plan B: 2.27 million	6 min.	~~128~~ 129 LRVs ~~(1)~~	~~467,200~~~~(2)~~(1) **471,510**
Light Rail Alternative - New Central Subway (2015)	--	Plan A: 365 diesels/ 258 trolleys Plan B: 365 diesels/ 258 trolleys	Plan A: 2.23 million/ Plan B: 2.23 million	5 min.	~~131~~ 132 LRVs ~~(1)~~	~~503,800~~~~(2)~~(1) **507.000**

Notes: ~~(1) One additional LRV adding 3,200 car hours would be required if the "mixed-flow" option were selected for the Third Street commercial core.~~

~~(2)~~ (1) Assumes one-car trains operating in the peak and midday for the IOS and for the New Central Subway.

TABLE S-2

ANNUAL OPERATING STATISTICS FOR THE PROJECT ALTERNATIVES
(Revised July 21, 1998)

Alternative	Peak Headways 15 Line	Diesel/Trolley Peak Demand (Systemwide)	Total Annual Diesel/Trolley Bus Hours (Systemwide)	Peak Headways [1]: Third Street Light Rail	LRV Fleet Peak Demand (System-wide)	Annual LRV Car-Hours (Systemwide)
Existing (1997-1998) (No Project Alternative)	6 minutes	373 diesel buses/ 263 trolley buses	2.29 million	--	107 LRVs	395,600
No Build/ TSM (2015)	5 minutes	400 diesel buses/ 269 trolley buses	2.40 million	--	107 LRVs	395,600
Light Rail Alternative - IOS (2015)	--	Plan A:[2] 370 diesels/269 trolleys Plan B: 369 diesels/269 trolleys	Plan A: 2.26 million/Plan B: 2.27 million	6 minutes	~~128~~ 129 LRVs~~[3]~~	~~467,200~~~~[4]~~[3] 471,500
Light Rail Alternative - New Central Subway (2015)	--	Plan A: 365 diesels/258 trolleys Plan B: 365 diesels/258 trolleys	Plan A: 2.23 million/Plan B: 2.23 million	5 minutes	~~131~~ 132 LRVs~~[3]~~	~~503,800~~~~[4]~~[3] 507,000

Notes:

[1] “Headways” refers to the time between transit vehicles on a given line

[2] Plans refer to Bus Route Plans associated with the Light Rail Alternative.

~~[3] One additional LRV adding 3,200 car hours would be required if the “mixed flow” option were selected for the Third Street commercial core.~~

~~[4]~~[3] Assumes one-car trains operating in the peak and midday for the IOS and for the New Central Subway.

E-6 Selection of the Western Pacific Site (West End) for the Proposed New LRV Maintenance Facility

On June 23, 1998, the Public Transportation Commission selected the Western Pacific (west end) site for the proposed new LRV maintenance and storage facility. The fourth paragraph on page 2-27 and the first paragraph on page 2-40 are revised accordingly.

> A short-turn loop from Third following 18th, Illinois, and 19th Streets would permit an extension of the N-Judah to the Mariposa Street station to serve Mission Bay. The track on Illinois between 18th and 19th would provide an area for 2-car trains to layover. Main lead track to the new LRV maintenance facility would be installed ~~either~~ on ~~Cargo Way or~~ 25th Street~~, depending on the site selected~~.
>
> ~~MUNI proposes~~ On June 23, 1998, the Public Transportation Commission elected to construct a new LRV maintenance and storage facility on 5.3 hectares (approximately 13.0 acres) of land ~~either~~ on the ~~eastern or~~ western portion of an abandoned Western Pacific rail yard site, which is being transferred to the Port of San Francisco.

Additionally, page S-4 of the Executive Summary is revised.

> The Light Rail Alternative would construct a light rail line linking some or all of the Chinatown, Downtown, South of Market, Potrero Hill, Bayview Hunters Point, and Visitacion Valley/Little Hollywood neighborhoods, primarily along Third Street. In addition, a new light rail maintenance and storage facility would also be constructed on approximately 5.3 hectares (13 acres) of ~~eastern or~~ western sections of the former Western Pacific rail **yard** and north of Pier 80 ~~or on a 7.1-hectare (17.5-acre) Port-owned site along Cargo Way near Pier 90.~~ The line would operate at service levels comparable to existing MUNI Metro service frequencies and hours.

The impact of the new light rail maintenance and storage facility on the City's Wastewatger system is expanded, as indicated in the second paragraph of page 5-41.

> No existing, major utilities would be affected at the Western Pacific or Cargo Way sites, **except for the combined sewer system on Third Street. Additional capacity will be provided by the construction of a new sewer line on Illinois Street. The diameter of the planned line will be expanded from 60 to 66 inches to provide sufficient capacity to accommodate the proposed light rail maintenance facility at the Western Pacific site. The Municipal Railway is negotiating with the San Francisco Public Utilities Commission to share the cost for a portion of the planned sewer project.**

E-7 Selection of the Fourth Street Bridge for Crossing Mission Creek

The Public Transportation Commission selected the Fourth Street bridge for a bi-directional crossing of Mission Creek by the light rail line. The second, fourth, and last paragraphs on page 2-30 are revised accordingly.

> ~~Two options are being studied for crossing Mission Creek. In the first option~~, **On June 23, 1998, the PTC selected the Fourth Street bridge for the light rail line to cross Mission Creek. To reach the Fourth Street bridge from Owens Street,** both light rail tracks would turn west onto Owens Street from Third and then travel across the Fourth Street bridge to King Street **(Figure 2-14)**.
>
> ~~The second option~~ **An alternative alignment would have** split the alignment into a one-way couplet crossing Mission Creek **(Figure 2-15)**.
>
> From ~~either~~ Fourth ~~or Third/Fourth~~, the IOS would turn into the median of King Street and join the existing MUNI Metro Extension track along King and The Embarcadero to the Market Street Subway portal north of Folsom Street.

E-8 Changes to IOS Station Locations and Selection of High Platforms for Light Rail Stations

The PTC selected high platform design for all IOS surface stations. In addition, MUNI staff has initiated changes to certain station locations in the southern portion of the Corridor. The third and fifth paragraphs on page 2-33 are revised accordingly.

> **On June 23, 1998, the PTC adopted the position of exclusively using high platforms at stations along the Third Street light rail line, after** ~~MUNI is~~ considering two design options for the station platforms: high and "hybrid" low platforms **(Figures 2-16A/B/C)**.

> High ~~or hybrid low~~ platforms would be placed in a staggered side-platform configuration (northbound and southbound platforms placed on the outside of the tracks caddy-corner from each other).

The first paragraph on page 2-37 and Table 2-5 on page 2-38 are revised to indicate that Visitacion Valley would have two light rail stations along Bayshore Boulevard.

> **Table 2-5** presents the proposed light rail station locations south of King Street along Third/Fourth and Bayshore Boulevard. The table indicates the type of platform (center or side) and the exact location of the platforms. ~~In Visitacion Valley along Bayshore Boulevard, only one station, designated by shading, would be built if high platforms were used.~~ **Center-platform stations would be located in Visitacion Valley along Bayshore Boulevard immediately south of Blanken Avenue and between Visitacion and Sunnydale Avenues**.

TABLE 2-5

THIRD STREET LIGHT RAIL PROJECT PROPOSED STATION LOCATIONS (THIRD/KING TO THE CALTRAIN BAYSHORE STATION)

(Revised July 24, 1998)

GENERAL LOCATION	TYPE	NORTHBOUND SIDE PLATFORM	SOUTHBOUND SIDE PLATFORM
Fourth/King	Center Platform Station	N/A	N/A
Third/Mission Rock	Side Platform Station w/Left Turn Lanes	Mission Rock to Owens	Mission Rock to Rincon
Third/South	Side Platform Station w/Left Turn Lanes	South to South Mall	South to 16th St.
Third/Mariposa	Side Platform Station w/Left Turn Lanes	Mariposa to 16th St.	Mariposa to 18th St.
Third/20th Street	Side Platform Station w/Left Turn Lanes	20th St. to 19th St.	20th St. to 22nd
Third/23rd Street	Side Platform Station w/Left Turn Lanes	23rd St. to Tubbs	23rd St. to 24th St.
Third/Cesar Chavez	Side Platform Station w/Left Turn Lanes	Chavez to 26th St.	Chavez to Marin
Third/Evans	Side Platform Station w/Left Turn Lanes	Evans to Davidson	Evans to Fairfax
Third/Hudson	Side Platform Station w/Southbound Left Turn Lane	Hudson to Galvez	Hudson to Innes
Third/LaSalle~~(1)~~	~~Side~~**Center** Platform Station No Left Turn Lanes	~~LaSalle to Kirkwood~~ **N/A**	~~LaSalle to McKinnon~~ **N/A**
Third/Palou-Oakdale~~(2)~~	Center Platform Station w/Northbound Left Turn at Oakdale **via Mendell Street**; Southbound Left Turn at Quesada	N/A	N/A
Third/Shafter~~(3)~~	~~Side~~ **Center** Platform Station No Left Turn Lanes	~~Shafter to Revere~~ **N/A**	~~Shafter to Thomas~~ **N/A**
Third/Williams-Van Dyke	Side Platform Station w/Left Turn Lanes	Williams-Van Dyke to Underwood	Williams-Van Dyke to Wallace
Third/Carroll	Side Platform Station w/Left Turn Lanes	Carroll to Bancroft	Carroll to Donner
Third/Gilman	Side Platform Station w/Left Turn Lanes	Gilman to Fitzgerald	Gilman to Hollister
Third/~~Jamestown-Ingerson~~ **LeConte-Key**	~~Side~~ **Center** Platform Station No Left Turn Lanes	N/A	N/A
Bayshore/Arleta ~~Raymond~~ **Blanken** ~~(hybrid low platform only)~~	Center Platform Station	N/A	N/A
~~Bayshore/Leland-Visitacion (high platform only)~~	~~Center Platform Station~~	~~N/A~~	~~N/A~~
Bayshore/Visitacion-Sunnydale ~~(hybrid low platform only~~)	Center Platform Station	N/A	N/A
Caltrain Bayshore Station	Center Platform Station	NA	N/A

~~Notes: (1) If the mixed flow right-of-way option were chosen for the Third Street commercial core, this would be a center platform station between Kirkwood and La Salle with no left turn lanes in that block.~~

~~(2) If the mixed flow right-of-way option were chosen for the Third Street commercial core, this would continue to be a center platform station between Oakdale and Palou, but left turns from Third to westbound Oakdale Avenue would occur via Mendell Street.~~

~~(3) If the mixed flow right-of-way option were chosen for the Third Street commercial core, this would be a center platform station between Shafter and Revere with no left turn lanes in that block.~~

E-9 Light Rail Alternative Capital Cost Estimate Revisions

The capital cost assumptions for the Light Rail Alternative have changed based on the options selected by the PTC at the June 23,1998, meeting. The mixed-flow option in the Third Street commercial core, the use of high platforms throughout the light rail alignment, and the need for the installation of floating slabs rather than ballast mats to mitigate vibration in certain locations has increased the total capital cost for the IOS to $408.9 million. As a result, the last paragraph on page 2-70 and the first two paragraphs and Table 2-12 on 2-71 are revised.

> As indicated in **Table 2-12**, the total capital cost for the IOS, including the purchase of ~~25~~ **26** additional LRVs, to accommodate 2015 demand and the construction of the initial phase for the new LRV maintenance and storage facility, is estimated at ~~$401.7~~ **$408.9** million (1997 dollars). The base capital cost estimates assumes that:
>
> - light rail uses the Fourth Street bridge in both directions;
> - ~~hybrid low~~ **high** platforms are used for all surface stations;
> - the ~~two-lane~~ **mixed-flow** design option is selected for the Third Street commercial core; and
> - ballast mats **and, if necessary, at certain locations along Third Street where vibration impacts would be more substantial, floating slabs** are installed to mitigate the vibration impacts anticipated from operating the existing LRV fleet.
>
> ~~The cost estimate would be greater if any other options replaced those in the base case, including use of the Third and Fourth Street bridges, selection of the one-lane or mixed-flow design option in the Third Street commercial core, installation of floating slabs rather than ballast mats to mitigate vibration impacts, or additional features to the new LRV maintenance facility~~.
>
> Construction of the New Central Subway, including the three additional LRVs and the same base case assumptions identified for the IOS, would require $505.9 million (1997 dollars). The combined total capital cost estimate for the Light Rail Alternative is $~~907.6~~ **$914.2** million.

The last paragraph of page 7-16 and Table 7-10 on page 7-17 are revised as well. MUNI and the San Francisco Transportation Authority are committed to address the identified shortfall of Proposition B revenues to fund the IOS (refer to Response 8-1).

TABLE 2-12

LIGHT RAIL ALTERNATIVE CAPITAL COST SUMMARY
(Revised August 26, 1998)

	INITIAL OPERATING SEGMENT		NEW CENTRAL SUBWAY	
DESCRIPTION	**QTY**	**COST**	**QTY**	**COST**
SYSTEM DATA		($000s)		($000s)
Route Length (Existing-New) - Route Meters	8973	0	3675	0
Track Length (New Only) - Track Meters	17386	0	5654	0
CONSTRUCTION COSTS				
Site – Demolition	960	223	0	0
- Utility Relocations/Modifications	8693	19482	3675	14694
- Street Restoration	8693	1839	3675	2088
- Traffic Signals	63	6300	7	700
- Structure Modif's and Underpinning	**1**	**6317**	2	3200
- Environmental Mitigations	5	1250	2	850
Trackway – At Grade (1 Track)	0	0	690	412
- At Grade (2 Track)	8193	8337	0	0
- Retained Cut/Fill	500	3160	0	0
- Ballast Mat (Vibration Control)	**1**	**3414**	0	0
Subway – Cut/Cover, Soil Cement Walls 1 Track	0	0	593	15190
- Cut/Cover, Soil Cement Walls 2 Tracks	0	0	1030	76903
- Mined Tunnel 1 Track	0	0	413	14828
- Mined Tunnel 2 Tracks	0	0	649	42125
Ventilation (Cut/Cover + Mined Tunnel)	0	0	2685	6100
Stations - At Grade	19	13815	1	400
- Underground	0	0	4	88497
Trackwork – Ballasted	16780	9547	690	392
- Direct Fixation	606	381	4964	3112
- Special, Turnouts, Turnback, Etc.	5	4048	1	640
Traction Power Supply	17386	17004	5654	5148
Signaling/Train Control	17386	8205	5654	8051
Communications/Fire/Life Safety	17386	4144	5654	2828
Urban Design/Landscaping/Park & Ride	**1**	7249	0	0
Art Commission Cost Allowance	17386	1912	5654	527
New LRV Maintenance Facility Yard & Shops - WP Site	1	49047	0	0
Light Rail Vehicles	**26**	**76,248**	3	9000
Subtotal CONSTRUCTION COSTS:		**$243,674**		$295,685
NON CONSTRUCTION COSTS				
Right-of-Way - Except New LRV Maintenance Facility	5	5381	0	0
Right-of-Way - New LRV Maintenance Facility	1	20500	0	0
Engineering & Management	0	**50,783**	0	77444
Subtotal NON-CONSTRUCTION COSTS		**$76,664**		$77,444
CONTINGENCY				
Contingency	0	**62,499**	0	95695
ESCALATION				
Escalation	0	0	0	0
PROJECT RESERVE				
Project Reserve	0	**26,112**	0	37056
Subtotal PROJECT RESERVE:		**$26,112**		$37056
TOTAL		**$408,949**		$505,880

Source: ICF Kaiser; *Conceptual Capital and Cost Estimates, Working Paper #5A;* November 1997; **Revised August 1998.**

The tables on the following pages identify the capital cost estimates for both the IOS and the New Central Subway. The IOS includes a new LRV maintenance facility and 25 additional light rail vehicles (Breda LRV3 Type, or equivalent). All capital cost estimates are provided in January 1997 dollars (i.e., FY 97 dollars). The capital cost estimate for the IOS is **$408.9** million; the capital cost estimate for the New Central Subway is $505.9 million. The combined project is estimated to cost **$914.8** million in January 1997 dollars. The individual cost elements for both projects are shown in **Tables 7-10 and 7-11.**

TABLE 7-10

CAPITAL COST ESTIMATES – THIRD STREET LRT IOS
(FY 97, $ in millions)
(Revised August 26, 1998)

Cost Element	**Estimated Cost**
Third Street Light Rail Project	
1. Surface Line and Stations (Design and Construction)	~~$191.5~~ 194.9
2. New LRV Maintenance Facility Operations and Maintenance Facility (Design and Construction)	81.2
3. Right-of-Way a. Line and Stations (Private Property) b. New LRV Maintenance Facility (Port Property)	 4.7 24.9(1)
4. LRV Procurement-~~15~~16Vehicles (including ATCS, sales tax)	~~57.2~~ 61.0(1)
Subtotal-Third Street	~~362.5~~ 366.7
Mission Bay Service	
5. Mission Bay LRV Procurement - 10 Vehicles	38.0(1)
6. Mission Bay Turnback Facility	4.2
Subtotal-Mission Bay	42.2
TOTAL COST	~~$401.7~~$408.9
Note: (1) Includes right-of-way, contingency, engineering and management, and project reserve costs Source: ICF Kaiser Engineers	

Additionally, the first and third paragraphs of S-10 in the Executive Summary are revised.

> The total capital cost for the IOS, including the purchase of ~~25~~ 26 additional LRVs to accommodate 2015 demand and the construction of the initial phase for the new LRV maintenance and storage facility, is estimated at ~~$401.7~~ **$408.9** million (1997 dollars). The base capital cost estimate assumes that:
>
> Construction of the New Central Subway, including three additional LRVs and the same base case assumptions identified for the IOS, would require $505.9 million (1997 dollars). The combined total capital cost estimate for the Light Rail Alternative is ~~$907.6~~ $914.2 million.

E-10 VIBRATION IMPACT ANALYSIS

Results of the preliminary vibration impact assessment were refined by Harris, Miller, Miller & Hanson in September 1998, the first, second, third, fourth, and fifth paragraphs on page 5-88 of the DEIS/DEIR, page S-22 of the Executive Summary, **Tables 5-14** on page 5-89 are revised. **Table 5-15** on page 5-89 is deleted.

> The results of the vibration impact assessment are summarized in **Table 5-14** ~~for residential land uses and Table 5-15 for institutional land uses. As indicated in the tables,~~ **The preliminary analysis indicated** a number of vibration impacts are projected for Segments 1, 2, 3, and 4. This reflects that the light rail tracks would be about 15 meters (50 feet) from the closest residences in these segments, and the impact distance is about 30 meters (100 feet). ~~Also shown in Tables 5-14 and 5-15 are the impact projections assuming mitigation.~~ **Results of this preliminary analysis, which were refined by Harris, Miller, Miller, & Hanson, are presented in Table 5-14.** The mitigation of ground-borne vibration is discussed in Section 5.13. 5.
>
> **Segment 1 - Caltrain Bayshore Station to the 101 Overcrossing**
>
> ~~Vibration impact is projected~~ for ~~residences that front onto this segment~~. ~~This includes a total of 43 residences, all of which are between Arleta and the overcrossing for 101 freeway. There are no institutional land uses that would be affected by vibration in this segment~~
>
> **No vibration effects are projected for any of the residences along this segment. Although there are a number of residences along Bayshore between San Bruno and the Highway 101 overcrossing, vibration propagation tests showed the soil in this area to have inefficient propagation characteristics, resulting in low vibration levels at these residences.**
>
> **Segment 2 - Highway 101 Overcrossing to Thomas Avenue**
>
> ~~Although much of Third Street in this segment is commercial land uses, there are also a number of single-family, multi-family and institutional land uses on Third Street. The projections are that ground-borne vibration would exceed the impact threshold at a total of 50 residences, church and one school~~. ~~Four of the residences would be affected by vibration from a crossover. These impacts can be eliminated by moving the crossover one block south.~~
>
> **No vibration effects are projected along this segment due, in part, to the inefficient high-frequency propagation characteristics of the ground in this area.**
>
> **Segment 3 - Thomas Avenue to Jerrold Avenue**
>
> ~~The projections are that ground-borne vibration would exceed the impact threshold at residences and institutions distributed along this segment. Impacts are projected at a total of 21 residences, one church, and one library.~~
>
> **No vibration effects are projected at any of the residential or institutional land uses distributed along this segment. Vibration impacts are unlikely due to the inefficient high-frequency vibration propagation characteristics of the soils in this area.**

Segment 4 - Jerrold Avenue to 16th Street

Ground-borne vibration impacts are projected for a total of ~~seven residences in~~ **two mixed-residential/commercial buildings along** this segment. The residences are located at the **northern** ~~southern~~ end of the segment between ~~Jerrold and Fairfax Avenue and in the middle of the segment between 22nd and 23rd~~ **20th and 22nd Streets. The vibration impact is due to the special trackwork (crossover) located near these buildings.**

TABLE 5-14

SUMMARY OF GROUND-BORNE VIBRATION AND NOISE IMPACT ASSESSMENT FOR RESIDENTIAL LAND USES

(Revised September 11, 1998)

Location	Closest Residence, ft	Speed, mph	Max. Impact Dist., ft		Number of Residential Impacts	
			No Mitigation	With Mitigation(1)	No Mitigation	With Mitigation(1)
Segment 1	50	5-30	45~~90~~	~~-50~~	0~~43~~	0
Segment 2						
	~~-50~~	25-35	35~~100~~	~~-55~~	0~~46~~	0~~28~~
	45	~~-25~~	35~~170~~	~~-55~~	0~~4~~	0
Segment 3	50	30-35	35~~100~~	~~-55~~	0~~21~~	0~~18~~
Segment 4	50	30-35	35~~100~~	40~~55~~	2~~7~~	0~~1~~
Segment 5	500	25-35	30~~100~~	--	0	0
Segment 6	<no noise sensitive receptors>					
Segment 7						
At-Grade Track	30	25	25(2) ~~(2)~~	--	0	0
Subway	30	15-45	20	-	0	0~~47~~
Total Impacts					2~~121~~	0

Notes:

(1) Ground-borne vibration mitigation is discussed in Section 5.13.5.

(2) The residential buildings on this section of track are relatively large masonry construction with spread footings or pile foundations. The estimated impact distance is less in Segment 7 than farther south on Third Street because of the attenuation assumed to occur ~~because of vibration coupling loss~~ at the soil/foundation interface.

~~TABLE 5-15~~

~~SUMMARY OF VIBRATION IMPACT ASSESSMENT FOR INSTITUTIONAL LAND USES~~

~~Receiver~~	~~Location~~	~~Dist. to Near Track, ft~~	~~LRT Speed, mph~~	~~Projected Ground-Borne Vibration Levels, VdB re 1 µin/sec~~		~~Impact~~	
				~~No Mitigation~~	~~With Mitigation~~(1)	~~No Mitigation~~	~~With Mitigation~~(1)
~~Segment 1~~	~~<no vibration sensitive institutional land uses>~~						
~~Segment 2~~							
~~Church/School~~	~~N of Key St, E of Third~~	~~50~~	~~35~~	~~80~~	~~74~~	~~Yes~~	~~No~~
~~Church~~	~~S of Paul Ave., W of Third~~	~~50~~	~~35~~	~~80~~	~~24~~	~~Yes~~	~~No~~
~~Church~~	~~N of Paul Ave., W of Third~~	~~110~~	~~35~~	~~71~~	~~64~~	~~No~~	~~No~~
~~Church~~	~~N of Armstrong, E of Third~~	~~140~~	~~25~~	~~72~~	~~65~~	~~No~~	~~No~~
~~Segment 3~~							
~~Church~~	~~S of Revere, E of Third~~	~~100~~	~~35~~	~~71~~	~~64~~	~~No~~	~~No~~(
~~Church~~	~~S of Bay View, W of Third~~	~~45~~	~~35~~	~~72~~	~~66~~	~~No~~	~~No~~
~~Library~~	~~N of Revere, E of Third~~	~~40~~	~~35~~	~~80~~	~~74~~	~~Yes~~	~~No~~
~~School~~	~~S of Newcomb, E of Third~~	~~60~~	~~35~~	~~77~~	~~71~~	~~Yes~~	~~No~~
~~St. Johns Church~~	~~N of Jerrold, E of Third~~	~~40~~	~~30~~	~~79~~	~~72~~	~~Yes~~	~~No~~
~~Segment 4~~							
~~School~~	~~N of Evans, E of Third~~	~~110~~	~~35~~	~~72~~	~~66~~	~~No~~	~~No~~
~~Segment 5~~	~~<no vibration sensitive institutional land uses>~~						
~~Segment 6~~	~~<no vibration sensitive institutional land uses>~~						
~~Segment 7~~	~~<no vibration sensitive institutional land uses>~~						

~~Notes:~~

~~(1) Ground-borne vibration mitigation is discussed in Section 5.13.5.~~

The bullet of key non-transportation impacts, which can be mitigated, on page S-22.

- vibration impacts to two residential/commercial buildings along Third Street between 20th and 22nd Streets; and

The mitigation measures on pages 5-97 and 5-94 as well as Table 5-17 are revised accordingly.

- vibration impacts to two residential/commercial buildings along Third Street between 20th and 22nd Streets; ~~78 residences, 2 churches, and 1 school resulting from operating the existing LRV fleet along Third Street;~~ and
- *Modifying the transit vehicle suspension to reduce vibration forces.* Recent tests comparing ground-borne vibration from the new Breda vehicles and the older Boeing vehicles shows that the Breda vehicles generate significantly higher vibration levels in the 12 to 40 Hz frequency range. Modifying the Breda vehicle suspension system so that they no longer generate higher levels in this frequency range would result in about 3 to 5 decibel reduction of overall vibration levels. ~~Breda and MUNI are currently investigating design modifications to achieve this.~~ Vibration measurements of

modified Breda vehicles indicate that the reduction of 4 to 6 decibels within this frequency range can be achieved. Based on these results, it has been assumed for the impact assessment that the Breda vehicles will be modified such that vibration levels in the 12 to 40 range will be reduced by 2 to 5 decibels.

- *Installing a vibration control track system such as ballast mats.* The vibration attenuation provided by ballast masts is strongly dependent on the design of the mat and the frequency spectrum of the ground-borne vibration. Ballast mats can be very effective at frequencies greater than 40 Hz, however, at lower frequencies there is the potential the mat to cause a small amplification. The attenuation of ballast mats can exceed 10 decibels at frequencies above 50 Hz, however, the reduction in overall vibration velocity is usually closer to 5 decibels. Most at-grade ballast mats have been installed on concrete pads or inside concrete "tubs." There is some controversy about whether the concrete pad or tub is necessary for a ballast mat to operate effectively. Some recent ballast mat installations have been directly on compacted subgrade. Should this prove to be effective, it would be a relatively cost-effective means to mitigate the vibration impacts.
- *Installing floating slab trackbed.* Floating slab trackbed basically consists of concrete slab track that is "floated" on rubber pads. There are several examples where floating slab tracks have been successfully used to control vibration from embedded track. They have the advantage of providing very predictable vibration control. The primary disadvantages are the substantial costs required costs after the system has been installed for several years.
- *Relocate crossovers and other special trackwork away from vibration sensitive receptors*. Wheel impacts at **crossovers** can substantially increase the levels of ground-borne vibration. When feasible, the impacts caused by the wheel impacts can be avoided by moving the special trackwork away from residential land uses **to increase the distance between the track and receptors.**

For this assessment, the ground-borne vibration impacts have been reassessed assuming a combination of modified vehicle suspension system and a vibration control track support system. ~~This approach is projected to reduce overall levels of ground-borne vibration by about 7 VdB, which would be sufficient to substantially reduce the degree of vibration impact.~~ The locations where the projections indicate that vibration mitigation would be needed and the preliminary recommendations for mitigation are given in **Table 5-17** below. ~~The residual number of vibration impacts are listed in **Table 5-14** for residential land use and **Table 5-15** for institutional land use.~~

~~Although the projections indicate that even with mitigation there could still be a substantial amount of ground-borne vibration, in almost all cases the projected ground-borne vibration level with mitigation is only one or two decibels over the impact threshold. Specific vibration mitigation measures will be evaluated during the final design of the Third Street Light Rail Project when a more comprehensive study of ground-borne vibration can be performed.~~

TABLE 5-17

SUMMARY OF VIBRATION MITIGATION MEASURES
(Revised September 10, 1998)

Area	Type of Mitigation	Extent	Residual Vibration
		Length, meters	
Segment 1			
Bayshore, Visitacion to Arleta	None required		
Segment 2	None required		
Segment 3	None required		
Segment 4			
20th to 22nd Streets	Ballast mat	60	0
Segment 5	None required		
Segment 6	None required		
Segment 7	None required		
TOTAL	Ballast mat	60	0

The amount that the above mitigation measures would reduce overall levels of ground-borne vibration is dependent on the dominant frequencies of the vibration spectrum, which is dependent on the local geologic conditions. For example, in areas where there is artificial fill, undifferentiated sediments, or Bay mud, the vibration propagation tests showed considerably more efficient propagation at low frequencies (below 16 Hz) than at other sites. This is important when selecting mitigation measures since most measures that mitigate ground-borne vibration are relatively ineffective at frequencies below 20 to 30 Hz. However, since the projected vibration levels in the proposed alignment are dominated by high-frequency vibration, ballast mats will be an effective means of eliminating impact near any vibration-impacted receptors.

Following is a summary of each of the areas where mitigation is recommended:

Segment 1 - Caltrain Bayshore Station to the 101 Overcrossing

No mitigation is required along this segment.

Segment 2 - Highway 101 Overcrossing to Thomas Avenue

No mitigation is required along this segment.

Segment 3 - Thomas Avenue to Jerrold Avenue

No mitigation is required along this segment.

Segment 4 - Jerrold Avenue to 16th Street

Vibration mitigation is recommended along this segment between 20th street and 22nd Street. Vibration impacts are projected at two mixed-residential/commercial bgs due to a nearby crossover. Moving the crossover away from these receptors will be sufficient to reduce

ground-borne vibration levels below the impact threshold. If it is not feasible to move the crossover, a ballast mat is recommended for this area because the projections indicate that it would effectively reduce the high-frequency components of the vbration spectra.

~~TABLE 5-17~~

~~SUMMARY OF VIBRATION MITIGATION MEASURES~~

~~Segment~~	~~Mitigation~~	~~Location~~	~~Civil Station~~	
			~~Start~~	~~End~~
~~Segment 1~~	~~Ballast Mat~~	~~Hester to San Bruno~~	~~20+130~~	~~20+450~~
~~Segment 2~~	~~Ballast Mat~~	~~Meade to Egbert~~	~~18+920~~	~~19+650~~
	~~Move X-over~~	~~Yosemite/Armstrong~~	~~18+500~~	~~18+550~~
~~Segments 2 and 3~~	~~Ballast Mat~~	~~Armstrong to Innes~~	~~17+110~~	~~18+570~~
~~Segment 4~~	~~Ballast Mat~~	~~22nd Street to 23rd Street~~	~~15+100~~	~~15+250~~

~~Mitigation of the projected ground-borne vibration impacts would require the following vibration control track systems:~~

- ~~a 320 meter section just south of the Highway 101 overcrossing;~~
- ~~an approximately 730 meter section starting just north of the Highway 101 overcrossing;~~
- ~~a section 1,640 meters long that includes the northern part of Segment 2 and almost all of Segment 3; and~~
- ~~a short 150 meter section between 22nd and 23rd Streets.~~

~~In all, the preliminary projections indicate that a length of approximately 2,840 meters of vibration control track system would be required, all for track that would be embedded in Third Street. Additional construction mitigation may be necessary to ensure that noise and vibration is not significantly higher when Breda vehicles travel over the Third Street and Fourth Street bridges. New residential and hotel construction is planned near these bridges.~~

~~A rough cost estimate is that the materials and installation cost for this length of ballast mat would be approximately $3.2 million. This cost estimate is based on a six-meter wide mat and a materials and installation cost of $215 per square meter. This cost does not include the additional cost of a concrete slab or tub, which, as discussed above, may not be necessary.~~

~~Traffic Noise~~

~~Although the light rail line would have a substantial effect on traffic patterns and volumes in the Third Street Corridor, none of the projected increases in traffic are sufficient to cause more than a one decibel change in noise exposure. This is an insignificant change in noise exposure and no noise impacts are projected.~~

E-11 Substation Locations

More precise locations for substation at the Caltrain Bayshore Station and at the Highway 101 overcrossing have been identified. Additionally, in response to community concerns, the proposed substation location in Mission Bay has been changed to 16th Street immediately west of Terry Francois Boulevard. The first paragraph of page 2-45 and **Figure 2-18** on page 2-46 are revised accordingly.

> For the IOS, seven substations, including an existing MUNI substation at Second and Berry Streets, would supply power to the light rail line. MUNI would construct six new substations on vacant land at or near the following locations **(Figure 2-18)**:
>
> - Mission Bay (~~east of Illinois Street at intersection of~~ **on 16th Street immediately west of** Terry Francois Boulevard);
> - Western Pacific ~~or Cargo Way~~ new LRV maintenance facility site (2);
> - Third/Hudson (east side of Third Street); or, **alternatively, at the City's Southeast Sewage Treatment Plant, which would preclude purchase of private property.West of** Third/Keith at the Highway 101 Overcrossing; and
> - **30 meters (100 feet) east of the** southeast corner of Bayshore/Sunnydale**, which would preclude purchase of private property**.

Table 5-1 is revised accordingly.

TABLE 5-1

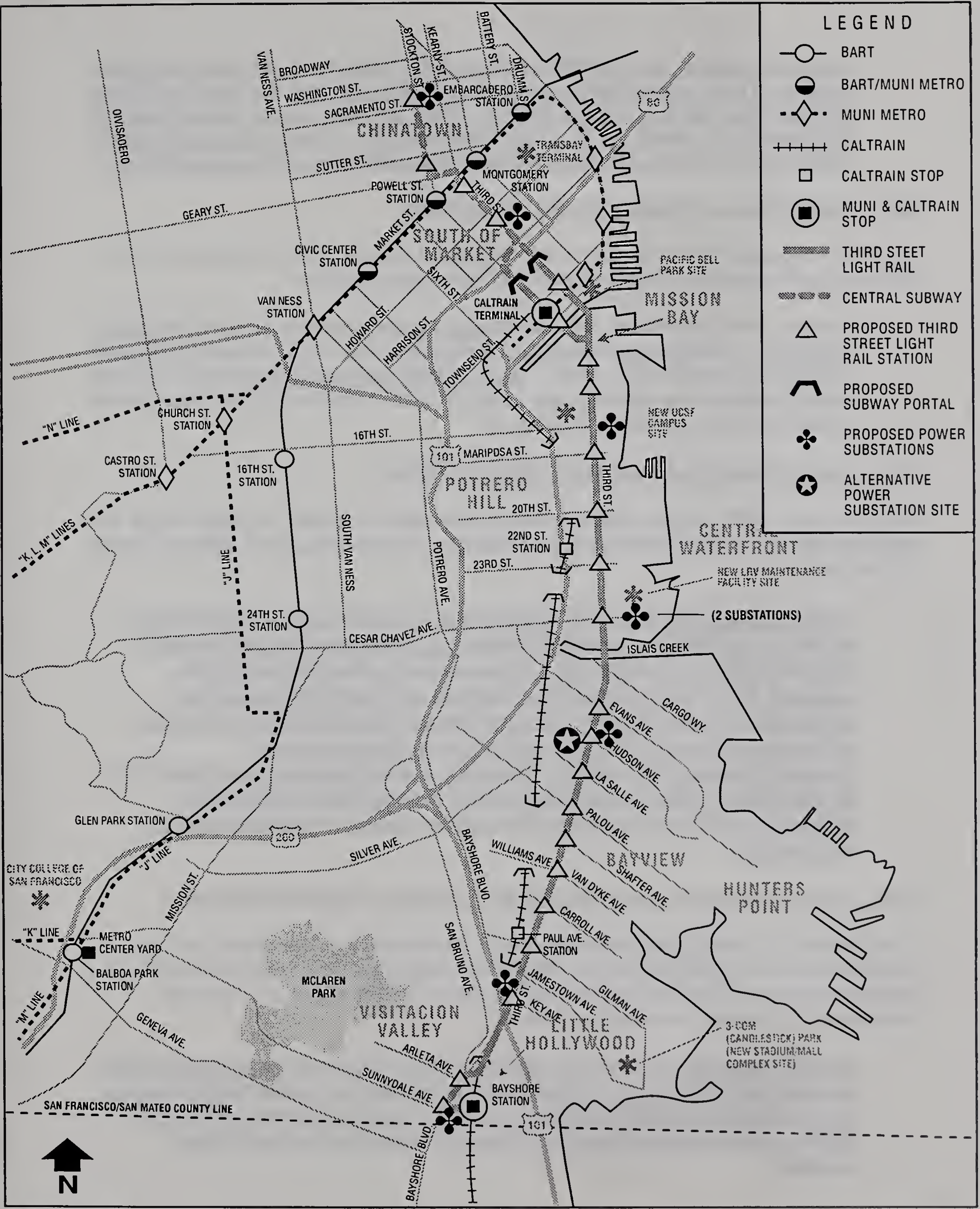
ACQUISITION AND RELOCATION REQUIREMENTS

LOCATION	REASON FOR ACQUISITION/SEGMENT	ACQUISITION	RELOCATIO
Keith St. near Key Avenue	Traction power substation (IOS)	vacant public right-of-way	No
Newhall St. at Hudson Avenue **(possibly)**	Traction power substation (IOS)	vacant private parcel	No
16th Street near Terry Francois Boulevard ~~Third St. near Mariposa St.~~	Traction power substation (IOS)	vacant private parcel	No

E-12 Project Development Process

Further explanation of the Third Street Light Rail Project phasing has been included at the end of Section 2.1.1 on page 2-2.

> **Preliminary engineering of the IOS phase of Third Street Light Rail Project supports the evaluation of its impacts and alternatives in this EIS/EIR, but preliminary engineering of the New Central Subway phase of the Project has not yet been conducted. Though related, these two phases are distinct, subject to separate advancement decisions on separate schedules. This EIS/EIR presents, in addition to the detailed information about the Third Street Light Rail Project, planning-level information with less engineering detail about the impacts and alternatives of the New Central Subway phase of the Project. This full disclosure of future plans is in accordance with the guidance of the Council on Environmental Quality, which encourages the consideration of reasonably foreseeable related projects and**



J96-082.68 3rd St. (9/1/98)

FIGURE 2-18

PROPOSED LOCATIONS OF NEW TRACTION POWER SUBSTATIONS

Third Street Light Rail EIS/EIR

Source: ICF Kaiser Engineers, Inc.

(Revised 9/1/98)

cumulative impacts. The Third Street Light Rail Project being advanced at this time is shown to have independent transportation utility, so it does not depend on future decisions about the New Central Subway. When the New Central Subway phase of the Project is advanced, if FTA funding is sought, the environmental record will be reviewed for currency and adequacy and supplemented if necessary and appropriate.

E-13 Reclassification of the Bay Area Air Quality Status

The US Environmental Protection Agency has reclassified the Bay Area's attainment status for carbon monoxide and ozone. The text on page 4-89 is revised accordingly.

> The Bay Area is designated as a national **attainment/**maintenance area for **federal CO standards.** A Redesignation Request and Maintenance Plan for the national CO standard was submitted to US EPA in 1993.[1]. **The US EPA has reclassified** the Bay Area from national attainment to nonattainment based on recent violations of the national ozone standard at several locations in the air basin.

E-14 Project-Related Health and Safety Risks for Children

Executive Order 13045 requires federal agencies to evaluate any project on related health and safety risks that would disproportionately affect children. The following text is added to Section 5.3.2 on page 5-14.

> **Another Executive Order—E.O. 13045, signed on April 21, 1997—require federal agencies to evaluate, and address if necessary, any project-related environmental health and safety risks that would disproportionately affect children. In this document, the sections on Hazardous Materials and Transportation address environmental health and safety risks associated with the Third Street Light Rail alternatives. There is no basis to conclude that such impacts would disproportionately affect children. Hazardous materials in the project right-of-way are more likely to affect construction workers than children, and the project alternatives would be constructed within existing transportation rights-of-way or underground.**

E-15 Draft Programmatic Agreement with the State Office of Historic Preservation

A Programmatic Agreement that identifies the steps to be under taken in constructing the New Central Subway to mitigation the potential effects on archaeological resources has been drafted and included the document. The text has been added to Section 5.5.3 on page 5-31. The Draft Programmatic Agreement is presented in Appendix F.

> **A draft Programmatic Agreement that identifies the steps to be taken in constructing the New Central Subway to mitigate the potential effects on archaeological resources is presented in Appendix F. The Programmatic Agreement between MUNI, FTA, SHPO, and the Advisory Council on Historic Preservation is currently being finalized.**

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[1] BAAQMD CEQA Guidelines, April, 1996.